



DEPARTMENT OF THE TREASURY

Community Development Financial Institutions Fund

Conflict of Interest Package for CDFI

Fund Non-Federal Readers

CONFLICT OF INTEREST POLICY FOR COMMUNITY DEVELOPMENT FINANCIAL INSTITUTIONS (CDFI) FUND READERS

Consistent with the Federal Acquisition Regulations provisions on conflicts of interest, the Community Development Financial Institutions (CDFI) Fund has applied, and will continue to apply, a conflict of interest policy with respect to its contract 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.

This policy document memorializes the standards by which the CDFI Fund will determine whether a conflict of interest or an appearance of a conflict of interest will prevent outside (non-federal government employee) readers, hired on contract, from being assigned particular applications and applies to all outside readers participating in the evaluation or process of selection for an award of any application to the CDFI Fund. The role of outside readers in any CDFI Fund award process is such that outside readers will not make decisions about whether an applicant is eligible for, or receives, an award.

A reader will be considered to have a conflict of interest or an appearance of a conflict of interest with respect to an application if the reader, his or her spouse, parent, dependent child or member of his or her household:

1. serves, or in the last year has served, as an officer, director, trustee, partner, agent, attorney, consultant, contractor, or employee of or receives the primary source of his or her income from that applicant or any parent, subsidiary or affiliate organization of that applicant;
2. is negotiating, or has an arrangement concerning, prospective employment (or other similar association) with that applicant or any parent, subsidiary or affiliate organization of that applicant;
3. has a financial interest in the CDFI Fund's action with respect to the application which would if held by a government employee, constitute a "financial interest" within the meaning of 18 U.S.C. section 208. (Such "financial interests" arise from, but are not limited to, receipt of salaries or fees paid by, and interests in equity or other securities issued by, the applicant or any parent, subsidiary or affiliate organization of the applicant);
4. has provided assistance to the applicant in the preparation of its application or otherwise facilitated the submission of the application; or
5. serves, or has served, during the preparation of the application or the pendency of the CDFI Fund award process in which the application is being considered, as an officer, director, trustee, partner, agent, attorney, consultant, contractor or employee of or receives the primary source of his or her income from an entity that either (1) has provided assistance in the preparation of the application or otherwise facilitated the submission of

the application or (2) has a financial interest in the CDFI Fund's action with respect to the application.

The Director of the CDFI Fund may determine, in consultation with appropriate ethics officials, that a reader who has a conflict of interest or an appearance of a conflict of interest with respect to a particular application should not be assigned other applications as well. Factors to be considered in making such determinations include: the nature of the conflict or appearance of conflict; the importance of the reader's role in reviewing such other applications; the nature of such other applications; the relationship, if any, of such other applications to the application presenting the conflict or the appearance of a conflict; and the difficulty of assigning such applications to a different reader.

All readers must submit a resume, complete and sign a conflict of interest certification form, a reader conflict of interest report form, and a nondisclosure certification form prior to being assigned to review any applications.

If, at any time during a CDFI Fund award process, a reader learns that he or she might have a conflict of interest or an appearance of a conflict of interest with respect to an application involved in such process, he or she must inform the Legal Counsel to the CDFI Fund immediately. A reader shall also inform the Legal Counsel of the CDFI Fund, if at any time during the CDFI Fund award process, he or she cannot objectively evaluate an application for any reason.

Conflict of Interest Certification for Community Development Financial Institutions (CDFI) Fund Readers

I, the undersigned reader of an application(s) to the Community Development Financial Institutions (CDFI) Fund, hereby certify that, except as described on Schedule A attached hereto, I do not have a conflict of interest and that my particular circumstances are not likely to create the appearance of a conflict of interest with respect to any application in a CDFI Fund award process in which I am a participant. For purposes of this certification, I recognize that I shall be considered to have a conflict of interest or an appearance of a conflict of interest with respect to an application if I, my spouse, parent, dependent child or any member of my household;

1. serves, or in the last year has served, as an officer, director, trustee, partner, agent, attorney, consultant, contractor, or employee of or receives the primary source of his or her income from that applicant or any parent, subsidiary or affiliate organization of that applicant;
2. is negotiating, or has an arrangement concerning, prospective employment (or other similar association) with that applicant or any parent, subsidiary or affiliate organization of that applicant;
3. has a financial interest in the CDFI Fund's action with respect to the application which would, if held by a government employee, constitute a "financial interest" within the meaning of 18 U.S.C. section 208. (Such "financial interests" arise from, but are not limited to, receipt of salaries or fees paid by, and interests in equity or other securities issued by, the applicant or any parent, subsidiary or affiliate organization of the applicant);
4. has provided assistance to the applicant in the preparation of its application or otherwise facilitated the submission of the application; or
5. serves, or has served, during the preparation of the application or the pendency of the CDFI Fund award process in which the application is being considered, as an officer, director, trustee, partner, agent, attorney, consultant, contractor or employee of or receives the primary source of his or her income from an entity that either (1) has provided assistance in the preparation of the application or otherwise facilitated the submission of the application or (2) has a financial interest in the CDFI Fund's action with respect to the application.

I recognize that this certification is a continuing representation. I acknowledge that it is in effect at all times until I have completed all of the work to be performed by me in connection with my review of applications to the CDFI Fund.

If, at any time during a CDFI Fund award process, I learn that I might have a conflict of interest or an appearance of a conflict of interest with respect to an application involved in the process, I shall inform the Legal Counsel of the CDFI Fund immediately. I shall also inform the Legal Counsel of the CDFI Fund if, at any time during the CDFI Fund award process, I believe that I cannot objectively evaluate an application for any reason.

Signature of Reader

Date

Printed or Typed Name of Reader

SCHEDULE A

Check here if **NONE** of the items below are applicable.

1. I, my spouse, parent, dependent child or a member of my household serves, or in the last year has served, as an officer, director, trustee, partner, agent, attorney, consultant, contractor, or employee of or receives the primary source of his or her income from the following applicant(s), or parent, subsidiary or affiliate organization of the applicant(s).

2. I, my spouse, parent, dependent child or a member of my household is negotiating, or has an arrangement concerning, prospective employment (or other similar association) with the following applicant(s), or parent, subsidiary or affiliate organization of the applicant(s).

3. I, my spouse, parent, dependent child or a member of my household has a financial interest in the CDFI Fund's action with respect to the following application(s) which would, if held by a government employee, constitute a "financial interest" within the meaning of 18 U.S.C. section 208. (Such "financial interests" arise from, but are not limited to, receipt of salaries or fees paid by, and interests in equity or other securities issued by, the applicant(s) or any parent, subsidiary or affiliate organization of the applicant(s).)

4. I, my spouse, parent, dependent child or a member of my household has provided assistance to the following applicant(s) in the preparation of the application(s) or otherwise facilitated the submission of the application(s).

5. I, my spouse, parent, dependent child or a member of my household serves, or has served, during the preparation of the following application(s) or the pendency of the CDFI Fund award process in which the following application(s) is being considered, as an officer, director, trustee, partner, agent, attorney, consultant, contractor or employee of or receives the primary source of his or her income from an entity that either (1) has provided assistance in the preparation of the following application(s) or otherwise facilitated the submission of the following application(s) or (2) has a financial interest in the CDFI Fund's action with respect to the following application(s).

Signature of Reader

Date

Printed or Typed Name of Reader

Reader Conflict of Interest Report
CDFI Fund FY 2007 Financial Assistance Component

Print Name: _____
 Signature: _____
 Date: _____

The following organizations have applied for assistance under the 2007 Financial Assistance Component of the CDFI Program. This list is confidential and should be treated accordingly. As a reader, please put a check next to those organizations with which you have a conflict of interest.

Check here if you do **NOT** have a conflict of interest with any of the organizations listed below.

| No. | Organization | State | Check if conflict |
|-----|---|-------|-------------------|
| 1 | AAFE Community Development Fund | NY | |
| 2 | ACCION Texas, Inc. | TX | |
| 3 | ACCION USA | MA | |
| 4 | African Development Center | MN | |
| 5 | Albany Community Together, Inc. | GA | |
| 6 | Alternatives Federal Credit Union | NY | |
| 7 | Appalachian Community Enterprises | GA | |
| 8 | ASI Federal Credit Union | LA | |
| 9 | Azteca Community Loan Fund | TX | |
| 10 | BAC Funding Consortium, Inc. | FL | |
| 11 | Bethex Federal Credit Union | NY | |
| 12 | Black Business Investment Fund of Central Florida, Inc. | FL | |
| 13 | Blue Water Community Development Fund | MI | |
| 14 | Boston Community Loan Fund | MA | |
| 15 | Brooklyn Cooperative Federal Credit Union | NY | |
| 16 | Business Loan Fund of the Palm Beaches, Inc., The | FL | |
| 17 | Capital Fund Services, Inc. | MI | |
| 18 | Carter Federal Credit Union | LA | |
| 19 | Ceda Community Development Fund | IL | |
| 20 | Ceiba Housing and Economic Development Corporation | PR | |
| 21 | Chattanooga Neighborhood Enterprise, Inc. | TN | |
| 22 | Chicago Community Loan Fund | IL | |
| 23 | Cincinnati Development Fund | OH | |
| 24 | City National Bancshares Corporation | NJ | |
| 25 | Coastal Enterprises, Inc. | ME | |
| 26 | Colorado Housing Enterprises, LLC | CO | |
| 27 | Columbus Compact Corporation | OH | |
| 28 | Columbus Housing Initiative | GA | |
| 29 | Communicating Arts CU | MI | |
| 30 | Community Capitol of Maryland, Inc. | MD | |

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Check here if you do **NOT** have a conflict of interest with any of the organizations listed below.

| No. | Organization | State | Check if conflict |
|-----|--|-------|-------------------|
| 31 | Community Development & Improvement Corporation | SC | |
| 32 | Community Development Bank, FSB | MN | |
| 33 | Community Development Capital | LA | |
| 34 | Community Development Resources | NE | |
| 35 | Community Development Venture Capital Alliance | NY | |
| 36 | Community First Fund | PA | |
| 37 | Community Loan Fund of Southwestern Pennsylvania, Inc. | PA | |
| 38 | Community Neighborhood Housing Services | MN | |
| 39 | Cooperative Fund of New England | MA | |
| 40 | Cornerstone, Inc. | DC | |
| 41 | Corporation for Supportive Housing | NY | |
| 42 | Delta Foundation, Inc. | MS | |
| 43 | economic opportunities fund | PA | |
| 44 | El Futuro Credit Union | CA | |
| 45 | Enterprise Community Loan Fund, Inc. | MD | |
| 46 | Faith Based Federal Credit Union | CA | |
| 47 | First Bank of the Delta, N.A. | AR | |
| 48 | First Combined Community Federal Credit Union | MD | |
| 49 | First Independence National Bank of Detroit | MI | |
| 50 | Florida Community Loan Fund, Inc. | FL | |
| 51 | Forward Community Investments | WI | |
| 52 | Franklin Bancorp Inc., d.b.a. Sunrise Community Banks | MN | |
| 53 | Funding Partners for Housing Solutions | CO | |
| 54 | Gateway Community Development Credit Union | NC | |
| 55 | Great Rivers Community Capital | MO | |
| 56 | Greater New Haven Community Loan Fund, Inc. | CT | |
| 57 | Hope Community Credit Union | MS | |
| 58 | Hopi Credit Association | AZ | |
| 59 | Housing Assistance Council | DC | |
| 60 | Illinois Facilities Fund, The | IL | |

Reader Conflict of Interest Report
CDFI Fund FY 2007 Financial Assistance Component

Print Name: _____
 Signature: _____
 Date: _____

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Check here if you do **NOT** have a conflict of interest with any of the organizations listed below.

| No. | Organization | State | Check if conflict |
|-----|---|-------|-------------------|
| 61 | Impact Seven, Inc. | WI | |
| 62 | Indianapolis Neighborhood Housing Partnership, Inc. | IN | |
| 63 | Intermountain Community Capital Corporation | UT | |
| 64 | Iowa Able Foundation | IA | |
| 65 | La Fuerza Unida Community Development Corporation | NY | |
| 66 | Latino Community Credit Union | NC | |
| 67 | Lawrence EDC | MA | |
| 68 | Legacy Redevelopment Corporation | WI | |
| 69 | Lenders for Community Development | CA | |
| 70 | Liberty Bank and Trust Company | LA | |
| 71 | Local Enterprise Assistance Fund | MA | |
| 72 | Local Initiatives Support Corporation | NY | |
| 73 | Los Angeles Community Reinvestment Committee d.b.a CFRC | CA | |
| 74 | Low Income Investment Fund | CA | |
| 75 | Lowcountry Housing Trust | SC | |
| 76 | Manchester NHS, Inc. | NH | |
| 77 | Miami-Dade Neighborhood Housing Services | FL | |
| 78 | Michigan Housing Trust Fund | MI | |
| 79 | MicroBusiness Development Corporation | CO | |
| 80 | Mile High Housing Fund, Inc. | CO | |
| 81 | Montana Community Development Corporation | MT | |
| 82 | Murex Investments, Inc. | PA | |
| 83 | National Federation of Community Development Credit Unions | NY | |
| 84 | National Housing Trust Community Development Fund | DC | |
| 85 | Nebraska Microenterprise Partnership Fund | NE | |
| 86 | Neighborhood Housing Services Lending, Inc. | ID | |
| 87 | Neighborhood Assets | WA | |
| 88 | Neighborhood Development Center, Inc. | MN | |
| 89 | Neighborhood Economic Development Corporation | AZ | |
| 90 | Neighborhood Housing Services of Chicago, Inc. | IL | |

Reader Conflict of Interest Report
CDFI Fund FY 2007 Financial Assistance Component

Print Name: _____
 Signature: _____
 Date: _____

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Check here if you do **NOT** have a conflict of interest with any of the organizations listed below.

| No. | Organization | State | Check if conflict |
|-----|--|-------|-------------------|
| 91 | Neighborhood Housing Services of Duluth, Inc. | MN | |
| 92 | Network for Oregon Affordable Housing | OR | |
| 93 | New Hampshire Community Loan Fund, Inc. | NH | |
| 94 | Nonprofit Finance Fund | NY | |
| 95 | Northcountry Cooperative Development Fund, Inc. | MN | |
| 96 | Northeast Economic Development, Inc. | NE | |
| 97 | Northeast South Dakota Economic Corporation (NESDEC) | SD | |
| 98 | Northern California Community Loan Fund | CA | |
| 99 | Ohio Capital Finance Corporation | OH | |
| 100 | Pacific Community Ventures, Inc. | CA | |
| 101 | Partners for the Common Good | DC | |
| 102 | People's Community Partnership Federal Credit Union | CA | |
| 103 | Progress Fund, The | PA | |
| 104 | RCAP Solutions Financial Services, LLC | MA | |
| 105 | Reinvestment Fund, Inc., The | PA | |
| 106 | Richmond Economic Development Corporation | VA | |
| 107 | Rising Tide Community Loan Fund | PA | |
| 108 | Rural Community Assistance Corporation | CA | |
| 109 | Rural Opportunities Enterprise Center, Inc. | NY | |
| 110 | San Luis Obispo County Housing Trust Fund | CA | |
| 111 | School Workers Federal Credit Union | NC | |
| 112 | Seattle Economic Development Fund d/b/a Community Capital | WA | |
| 113 | Seedco Financial Services | NY | |
| 114 | Self-Help Credit Union | NC | |
| 115 | Sephardic Angel Fund | NY | |
| 116 | South Dakota Rural Enterprise, Inc. | SD | |
| 117 | Southwest Virginia Community Development Financing, Incorporated | VA | |
| 118 | Springfield Neighborhood Housing Services, Inc. | MA | |
| 119 | Syracuse Cooperative Federal Credit Union | NY | |
| 120 | The Housing Fund, Inc. | TN | |

Reader Conflict of Interest Report
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Print Name: _____

Signature: _____

Date: _____

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Check here if you do **NOT** have a conflict of interest with any of the organizations listed below.

| No. | Organization | State | Check if conflict |
|-----|--|-------|-------------------|
| 121 | Trenton Business Assistance Corporation | NJ | |
| 122 | Tulsa Economic Development Corporation | OK | |
| 123 | United Bank and Trust Company | LA | |
| 124 | University Financial Corporation | MN | |
| 125 | Valley Small Business Development Corporation | CA | |
| 126 | Vermont Community Loan Fund, Inc. | VT | |
| 127 | Virginia Community Capital, Inc. | VA | |
| 128 | Washington Area Housing Trust Fund | DC | |
| 129 | Washington Assoc. of Minority Entrepreneurs Inc. | WA | |
| 130 | West River Foundation for Economic and Community Development | SD | |
| 131 | West Texas Credit Union | TX | |
| 132 | Western Massachusetts Enterprise Fund Inc. | MA | |
| 133 | Wisconsin Women's Business Initiative Corporation | WI | |
| 134 | WomenVenture | MN | |

**NONDISCLOSURE CERTIFICATION FOR
COMMUNITY DEVELOPMENT FINANCIAL INSTITUTIONS (CDFI) FUND
READERS**

By signature of this document, the undersigned certifies to the following: All information made available to the undersigned for purposes of reviewing applications to the Community Development Financial Institutions Fund (the "Fund") (including the names of and total number of applicants), or any such information which otherwise comes into the possession of the undersigned during the review of said applications, and any such information developed by the undersigned during such review, shall be used only for the express purpose of completing such review or otherwise assisting the Fund to accomplish its purposes, and shall not be disclosed to any other individual or firm outside of the United States Government. Further, all discussions connected with reviewing applications to the Fund and all evaluations of said applications including, without limitation, any comments, advice or recommendations given by any reader with respect to any application, shall not be disclosed to any individual or firm not participating in such review and/or evaluations.

Signature of Reader

Date

Printed or Typed Name of Reader

**PRIVACY ACT NOTICE FOR:
CONFLICT OF INTEREST PACKAGE FOR NON-FEDERAL READERS**

This information is provided pursuant to Public Law 93-579 (Privacy Act of 1974), December 31, 1974, for contractors being considered as readers of applications submitted to the Department of the Treasury's Community Development Financial Institutions Fund (Fund). The completion of this package is mandatory for all contractors to be selected as readers. Failure to fully complete this package will result in contractors being rejected from consideration as a reader.

Authority

12 U.S.C. § 4703(c); and 48 C.F.R. Subpart 9.5.

Purpose and Uses

This information is used by appropriate reviewing officials 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.

Paperwork Reduction Act Notice

This conflict of interest package is used by the Community Development Financial Institutions 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 this package is mandatory for all contractors to be selected as readers. (12 U.S.C. § 4703(c); 12 U.S.C. § 4712(b)). Contractors are not required to respond to this collection of information unless it displays a currently valid OMB number. Generally, information submitted in response to this package shall be maintained to insure confidentiality as required by 5 U.S.C. § 552(a), except to the extent that disclosure of such information is permitted pursuant to 5 U.S.C. § 552(a). The estimated average burden associated with this collection of information is 45 minutes. Comments concerning the accuracy of this burden estimate and suggestions for reducing this burden should be directed to the Department of the Treasury, Community Development Financial Institutions Fund, 601 13th Street, N.W., Suite 200 South, Washington, DC 20005.

**OMB Approval No. 1559-0011
CDFI-0016**