Community Development Financial Institutions Fund, Department of the Treasury

Supporting Statement for Community Development Financial Institutions Program Native American CDFI Assistance (NACA) Program Application <u>New Collection</u> (CDFI Form number: CDFI-0009)

A. Justification

1. Circumstances necessitating collection of information

The 4th Continuing Resolution (Pub. L. No. 110-5) authorizes the Fund to provide financial assistance and technical assistance, training and outreach programs to benefit Native American, Alaska Native and Native Hawaiian communities (hereafter referred to as "Native American Communities"), with such benefit being provided primarily through qualified community development lender organizations with experience and expertise in community development banking and lending in Indian country, Native American organizations, Tribes, tribal entities, and other suitable providers. Form CDFI 0009 (attached) will be used by applicants to apply for this assistance through the Native American CDFI Assistance (NACA) Program. The information collected will be used to select awardees, based on a merit-based selection process. The information is required by the respective Notice of Funds Availability (NOFA) as published in the <u>Federal Register</u>.

2. Method of collection and use of data

Data will be collected by the Fund per each funding application submitted. Data collected is used by the Fund to select eligible, qualified applicants and to determine the applicable award amounts.

3. Use of Information Technology

The Fund intends to make the NACA Program application available on the Fund's website for downloading and viewing. The Fund will also provide the application through the Grants.gov portal, which will reduce applicant burden by allowing them to enter data directly into the requested format. This Internet-based application will reduce burden by eliminating document production and mailing. No longer are paper application accepted.

4. Efforts to identify duplication

The Fund requests information from applicants that they are likely to have readily available and in a convenient form. The Fund has eliminated areas of duplication, for example, by eliminating the requirement that applicants report on their past compliance with Fund Assistance Agreements if the applicant has previously received funding from the Fund. The Fund now has this information available in a database. In addition, the Fund has consulted with the federal financial regulatory agencies to determine what information is available to the Fund from these sources. Thus, the Fund is able to avoid requesting information from applicants that is otherwise available from other federal sources.

5. Impact on small entities

This collection of information is not expected to have significant impact on small entities. The Fund reviewed this application to determine where questions and charts could be eliminated or consolidated. Finally, the Fund considered input from the public in developing the application. The result is an application that gathers only the information needed by the Fund to make a prudent funding decision, thereby minimizing any potential burden on small entities.

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

The Fund cannot make funding decisions without the data received from applicants as presented in the application.

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7. Circumstances requiring special information collection

Any confidential business information submitted by applicants is safeguarded through the Fund's records management procedures and information technology security protocols.

8. Solicitation of comments on information collection

Comments were solicited through the *Federal Register* (72 FR 37567) on July 10, 2007, a copy of which is attached. The comments were due to the Fund on September 10, 2007 and the Fund received XX sets of comments. The most substantive or common comments were as follows: <u>Insert comments</u> or comments from the public.

9. Provision of payment to respondents

No payments or gifts will be made to respondents.

10. Assurance of confidentiality

The Fund is subject to all applicable Federal regulations with respect to confidentiality of information supplied in the application process. No specific assurance of confidentiality has been provided to applicants.

<u>11. Justification of sensitive questions.</u>

No questions of a sensitive nature are asked in the application form.

12. Estimate of the hour burden of information collection.

The total hour burden of this information collection is estimated at 2,600 hours.

Application for Native American CDFI Assistance Program (Form 0009): 40 respondents x 1 response annually x 65 hours per respondent = 2,600 hours

The Fund estimates the number of respondents based on the number of applicants under the 2007 Native American CDFI Assistance (NACA) program that would be eligible to apply to the NACA Program, decreased somewhat due to unfamiliarity with the electronic application format (Grants.gov) and a reduction in annual appropriations. The Fund maintained the estimate of 40 respondents in the July 10, 2007 Notice and Request for Comments on the NACA Application because of the strong response by the public and potential applicants to the announcements of 2007 NACA Awards.

The hour estimate is based on the information collected from the Fund from 2007 applicants on the estimated time to complete the application. The mean estimate was 65 hours for NACA.

13. Estimate of total annual cost burden to respondents

It is not expected that this information collection will have a cost burden to respondents other than the hour burden described in item number 12. No purchases of equipment or services will need to be made by respondents for the sole purpose of completing the application.

14. Estimate of annualized cost to the Government

The primary costs to the Government are the formatting of the application format and the time needed to review submitted applications.

<u>15. Any program changes or adjustments</u>

The program has not had any significant changes or adjustments.

<u>16. Plans for information tabulation and publication</u>

The information collected through this application form will not be published.

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<u>17. Reasons for not displaying expiration date of OMB approval</u>

The CDFI Fund intends to display the expiration date of the OMB approval on the application form.

<u>18. Explanation of exceptions to certification statement</u> Not applicable.

B. Collections of Information Employing Statistical Methods

Not applicable.