

Supporting Statement for the Bank Enterprise Award Program of the
Community Development Financial Institutions Fund
Bank Enterprise Award (BEA) Program Application
CDFI Form 0002

A. Justification

1. Circumstances necessitating collection of information

The Community Development Financial Institutions Fund (CDFI Fund) implements a Bank Enterprise Award (BEA) Program that provides incentives to insured depository institutions to increase their support of CDFIs and their activities in economically distressed communities. The Application form and materials will be used by applicants to the Program to apply for Bank Enterprise Awards. Applicants are required to complete and submit an application so that the CDFI Fund can evaluate applicants for awards.

2. Method of collection and use of data

Data will be collected by the CDFI Fund once per funding round in the form of an application and supporting documentation submitted by institutions wishing to be considered for a Bank Enterprise Award. The CDFI Fund uses submitted information to determine qualified award amounts.

3. Use of Information Technology

The CDFI Fund has established an online mapping system that allows applicants to determine and define their targeted distressed community as well as to geocode transactions to determine if they are eligible. This mapping system is simple to use and reduces the burden to applicants, which would otherwise have to define targeted distressed communities and geocode transactions by hand. The CDFI Fund also allows applicants to submit a list of all eligible transactions electronically, which allows for more efficient award calculation.

4. Efforts to identify duplication

The CDFI Fund does not request information that is publicly available from other Federal agencies, namely, financial institution regulatory agencies.

5. Impact on small entities

This collection of information is not expected to have significant impact on small entities. During the development of the application, the CDFI Fund consulted with other Federal agencies –specifically, financial institution regulatory agencies –to determine what information is available to the CDFI Fund from these sources. In doing this, the CDFI Fund was able to lessen any potential burden on small entities.

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

The CDFI Fund cannot meet its statutory requirement to make award decisions without the materials received from applicants. Required elements of the collection specified in the Program’s regulation limit the amount to which the burden can be reduced.

7. Circumstances requiring special information collection

Not applicable.

8. Solicitation of comments on information collection

Comments on the application for this Program were solicited in the *Federal Register* (FR Doc No: 2011-27973) on October 28, 2011 and were due to the CDFI Fund by December 27, 2011. One comment was received. See attached for the comment and the CDFI Fund response.

9. Provision of payment to respondents

No payment or gift will be made to respondents.

10. Assurance of confidentiality

The CDFI Fund is subject to all Federal regulations with respect to confidentiality of information supplied in the application process.

11. Justification of sensitive questions.

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

12. Estimate of the hour of burden of information collection

The total hour burden of this information collection is estimated at 1,125 with an estimated 15 hours for the application per respondent. The CDFI Fund anticipates 75 respondents to the application (based on the number of applications received in the FY 2010 and FY 2011 rounds).

13. Estimate total annual cost burden to respondents

There are no cost burdens associated with the collection of this data. No purchases of equipment or services are necessary to complete this application.

14. Estimate of annualized cost to the Government

The cost to the Government is the CDFI Fund staff time required to develop the application, process the applications, follow-up with respondents, review the applications (also reviewed by a contractor), calculate award amounts, and report the results.

15. Any program changes or adjustments

The increase in burden is due to an adjustment in our estimate in the number of applicants, based on those received during the 2010-2011 funding rounds from 60 to 75 applicants.

The FY 2012 BEA Program application is substantively the same as the previous application (FY 2011) other than (i) an additional certification form to complete on Persistent Poverty Counties and (ii) clarifying language regarding the following:

- a. Partially disbursed Qualified Activities
- b. Distressed Community Financing Activities of which a portion was used to refinance or renew existing loans with the borrower
- c. CDFI Related Activities: Certificates of Deposits renewed for a new 3-year period

The above changes do not impact the burden of the Applicant.

16. Plans for information tabulation and publication

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

17. Reasons for not displaying expiration date of OMB approval

The CDFI Fund's request not to display the OMB expiration date on the current application is because the specific application period, as identified in the NOFA, may cause confusion on when the application is due.

18. Explanation of exception to certification statement

Not applicable.

B. Collections of Information Employing Statistical Methods

Not applicable.