DEPARTMENT OF THE TREASURY WASHINGTON, D.C. 20220



Supporting Statement CDFI Program and NACA Program Application

A. Justification

1. Circumstances necessitating collection of information

Pursuant to the Riegle Community Development Banking and Financial Institutions Act of 1994, as amended (the Act, 12 USC 4701 et seq.), the Community Development Financial Institutions (CDFI) Program provides financial and technical assistance to selected applicants and Community Development Financial Institutions (CDFIs) in order to enhance their ability to make loans and investments and provide services for the benefit of designated Investment Areas and Targeted Populations. The attached application form will be used by CDFI Program, Native American CDFI Assistance (NACA), and Healthy Food Financing Initiative (HFFI-FA) applicants to apply for this assistance. The information collected will be used to select awardees, based on a merit-based selection process. The requested information is required by the CDFI Program regulations (12 CFR Part 1805) and respective Notice of Funds Availabilities.

2. Method of collection and use of data

The CDFI Fund will collect data once per funding round by means of an application. Applicants must complete and upload the application form and all attachments (including legal certifications, eligibility forms, narrative answers, and financial information) via Grants.gov or through their myCDFIFund Account – the CDFI Fund's database maintained for every applicant. All application materials use Microsoft (MS) Word, Microsoft Excel, or Adobe Acrobat templates, which will allow greater ease for collecting and compiling data into a database. The CDFI Fund uses the data collected to select eligible applicants that are the most highly qualified and to determine the applicable award amounts.

3. Use of Information Technology

Only electronic applications are accepted unless the applicant receives advance written permission from the CDFI Fund to submit in other formats. All application materials use MS Word, MS Excel, or Adobe Acrobat templates.

4. Efforts to identify duplication

The CDFI Fund requests information from applicants which is likely to be readily available and in a convenient form.

5. Impact on small entities

This application form is not expected to have significant impact on small entities.

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

The CDFI Fund cannot meet its statutory requirement to make funding decisions based on data received from applicants without the application form. Elements specified in the Act and the CDFI Program regulations limit the extent to which the burden can be reduced.

7. Circumstances requiring special information collection

The CDFI Fund requires CDFI Certification applicants to submit information on their respective Target Market through the Community Investment Mapping System (CIMS). This system allows the applicant to enter decennial census data into CIMS, which helps determine if the communities they serve or intend to serve are qualified census tracts under the CDFI Program. This effort has been instituted as part of the CDFI Certification Application and does not change with this application form.

8. Solicitation of comments on information collection

In accordance with the Paperwork Reduction Act of 1995, the Department of the Treasury published a notice in the Federal Register regarding the Financial Assistance and Technical Assistance Application of the CDFI Program on March 19, 2012, Volume 77, and page 16,117. Please see Attachment A for the comments that were received and an explanation as to how they were addressed in the application.

9. Provision of payment to respondents

No payments or gifts will be made to respondents.

10. Assurance of confidentiality

The CDFI Fund is subject to all applicable Federal laws and regulations with respect to confidentiality of information supplied in the application process. All applicants are assured that the CDFI Fund will not disclose any information, to the extent allowed by law.

11. Justification of sensitive questions.

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

12. Estimate of the hour burden of information collection.

Program	# Respondents	# Responses Per Respondent	Total Responses	Hours Per Response	Total Burden Hours
CDFI Program	400	1	400	50	20,000
NACA Program	66	1	66	50	3,300
HFFI (Must also apply for either CDFI or NACA)	26	1	26	30	780
Total	466	1	492	49	24,080

The hour estimate is based on the number of applicants that applied for funding in FY 2012 using the CDFI Program Combined Application, the NACA Combined Application, and the HFFI-FA Questionnaire and the estimated number of hours the FY 2014 application form should require. The estimated hours for completing the FY 2014 application are compared to the number of hours required to complete the existing collection tools (100 ¹/₂ hours for CDFI and NACA Applications and 30 hours for the HFFI-FA Questionnaire).

The FY 2014 application is an integrated smart collection tool that automatically populates fields requiring the same information. In addition, it allows applicants to select the program for which they want to apply, which is the reason the CDFI Fund is requesting the CDFI Program, the NACA Program and the HFFI-FA Initiative be consolidated into this single collection tool. Furthermore, applicants can cut and paste from other documents rather than manually entering the information as required in the current application. Lastly, repetitive questions have been eliminated.

In combination, these changes should reduce the applicant's burden hours from 100 1/2 hours in the current application to 50 in the FY2014 for the CDFI and NACA Combined application. No change is anticipated in the number of hours to complete the HFFI-FA Questionnaire.

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 reviews of the applications.

15. Any program changes or adjustments

The FY 2014 application introduces an integrated smart collection tool that will now be used to collect data from CDFI Program applicants, NACA applicants and applicants for HFFI-FA. This will combine collections currently cleared under OMB number 1559-0024 (Native American CDFI Assistance [Combined] Application) and 1559-0040 (Healthy Food Financing Initiative Financial Assistance Questionnaire) under one OMB control number. Action will be taken by the CDFI Fund to discontinue OMB No. 1559-0024 and 1559-0040 once clearance is obtained for this action.

An adjustment in the number of respondents is attributed to the CDFI Fund's estimate based on the applications received during the FY 2012 funding rounds for all three programs.

The new interactive, integrated application reduces the burden on the applicant, allowing them to enter data into charts and tables in a spreadsheet rather than descriptive information in a narrative. The spreadsheet is a smart tool, using fields to automatically populate if data is entered once and needed again in another field. In addition, duplicative information has been eliminated and questions are more specific. This will decrease the amount of time to complete the application from 100 ½ hours to 50 hours per response for the applicants.

This revision reflects an increase of 20,100 hours due to an adjustment in the number of applications received under the CDFI Program; and a reduction of 16,120 hours due to the new consolidated interactive collection tool. Total burden hours requested for this submission is 24,080.

<u>16. Plans for information tabulation and publication</u> The information collected through this application form will not be published.

<u>17. Reasons for not displaying expiration date of OMB approval</u> The CDFI Fund will display the expiration date of the OMB approval on the application form.

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

Collections of Information Employing Statistical Methods

Not applicable.