

# Community Development Financial Institutions Fund

## Data Release Protocol Community Development Financial Institutions CDE and CDFI Transaction Level Report Data July 21, 2010

To assure the privacy of Community Development Financial Institutions (CDFIs), the CDFI Fund has designed a set of procedures to protect the confidentiality of these organizations while maintaining the integrity of these dataset. To that end, several steps are taken to shield the identity of these respondents. Our objective is to make available the widest array of this information without revealing the identities of CDFIs, CDEs, investors, or individual projects funded by CDFIs or CDEs.

Data Suppressed for All Organizations. The following data will be suppressed:

- Information that explicitly identifies an individual (such as name, race, or credit scores).
- All tax identifiers.
- Name, telephone number and email address of the Person Responsible for Completing the Survey.
- Responses to open-ended questions.
- Data collected solely to evaluate a CDFI Program awardees' compliance with its assistance agreement.
- Data collected solely for internal CDFI Fund purposes.
- Summary financial ratios calculated by CIIS.

In addition, any data the CDFI Fund determines to be erroneous that cannot be replaced with a correct response obtained from the reporting entity shall be suppressed. Examples include typographical errors and responses that, in the CDFI Fund's judgment, are grossly inconsistent with the majority of the CDFI's data.

Below is a detailed description of which data fields in each section are provided and how, if applicable, they are masked. For a complete list of data definitions, see "FY 2009 CDFI Transaction Level Report: Data Point Guidance CIIS 7.0, September 10, 2009" and "FY 2009 Allocatee Transaction Level Report: Data Point Guidance CIIS 7.0, September 10, 2009" at [http://www.cdfifund.gov/what\\_we\\_do/ciis.asp](http://www.cdfifund.gov/what_we_do/ciis.asp).

Below is a detailed description of which data fields will be suppressed or modified. Note that these procedures will be different for different versions of CIIS as variables are added and modified.

### I. Organizational Information

#### A. Basic Information

Four data points not submitted by the organization to CIIS are added to the data set: 1) Organization ID for Public Release. This unique identification number is not the same as the CDFI Fund's internal Organization ID number and will remain constant each time the organization's data is released so that the organization can be tracked over time. The Organization ID for Public Release cannot be used to identify the organization. 2) Report Year, indicating the fiscal year covered by the data; 3) Financial Institution Type (loan fund, bank, etc.); and 4) Organizational Structure (for profit, nonprofit, etc.).

The Date of Organization's Fiscal Year End will be suppressed.

Year of Organization's Incorporation and Year Organization Began Financing Activities are provided, but are rounded to decade to mask identity.

#### **B. Transaction Identifier**

The Originator Transaction ID entered by organizations will be suppressed.

A new identifier—the NMTC/CDFI Origination ID—created for the public release of these data, will be substituted. This identifier will be unique for each transaction and remain consistent across all years for which reporting is required. This NMTC/CDFI Origination ID can also be linked to the organization ID created for public release for each organization.

Client identifications created for submission to CIIS, as well as the Investor and Investee TIN will be suppressed.

QLICI Type (CDE or QALICB) information will be provided without modification.

### **II. Transaction Profile**

All information collected in the transaction profile will be publicly released without modification. This includes information on rates and terms: date of origination, loan or investment amount, the purpose of the loan or investment, transaction type, interest rate, interest type, points, origination fees, amortization type, equity-like features, term, date first payment due, guarantee, lien position, collateral type, collateral value at origination, and equity injection amount.

These data do not constitute information likely to cause substantial harm to the competitive position of the business.

### **III. Addresses**

Borrower/Investee and Project Street Address and Zip Code + 4 will be suppressed. They will be replaced by the census tract FIPS code. The remaining Investee and Project address data (City, State, Zip Code 5) will be provided without modification.

The following additional data will be provided for each census tract a project is located in: 2003 Rural-Urban Code, 2003 Rural-Urban Code Description, Metro/NonMetro, Median Family Income, Poverty Rate, and NMTC Program Low Income Community (LIC) eligibility.

All address-related data for NMTC and CDFI transactions will be provided in a separate data file because single transactions can finance multiple addresses. Data in the two files can be linked using the Originator Transaction ID for Public Release.

#### **IV. Borrower/ Investee Profile**

Information on QALICB type (real estate or non-real estate), the date the business was established, entity structure (profit or not for profit, Tribal, or Other), and data on the number of jobs in the business at time of investment will be provided without modification.

NAICS (North American Industrial Classification System) and SIC (Standard Industry Codes) will be provided as entered, without modification

Information on the whether the borrower/investee entity is more than 50% owned or controlled by a one or more minorities, women, or low income persons will be suppressed. These data reveal or can reveal information on individuals.

#### **V. Transaction Status**

All information on disbursement of QEIs will be suppressed. These data were collected by the CDFI Fund solely for compliance and will not be made publicly available.

The principal balance outstanding and will be suppressed from the publicly available file.

All other data regarding the status of the loan (days delinquent, number of times 60 days or more delinquent, number of times the loan was restructured, number of times the loan was refinanced, the originator transaction id for public release, amount charged off, amount recovered, fair value at the beginning and end of the reporting period) will be provided without modification.

Information on the number of jobs at the end of the reporting period, data on counseling and other financial services (FCOS) provided to the investee or borrower and on the annual gross revenue from business operations during the reporting period will be provided without modification. Neither these data nor information on disbursements compromises the competitive position of any business.

#### **VI. Impact Profile**

Credit scores, gender, race, and the Hispanic origin of borrowers/investees, will be suppressed. These data can provide information about individuals.

Other Impacts Profile fields, will be released without modification. These include the number of hours of Development Services (DS) and Financial Counseling and Other Services (FCOS) provided by the CDFI to the investee/borrower at the time of investment, the DS/FCOS provided to the investee/borrower after the investment or loan, total project cost, and public sources of total project cost.

This information does not constitute information likely to cause substantial harm to the competitive position of a business.

## **VII. Projected Impacts**

Projected impact fields will be released without modification. This includes the projected number of jobs created, capacity of community facilities, square feet of manufacturing, office, and retail real estate, the asking rent per square feet of these facilities, the number of housing units for sale and rental, and the number of affordable housing units for sale and rental.

All other impacts fields will be suppressed. All open-ended responses are suppressed: in this case, the quantitative fields that accompany these explanations are also suppressed from the publicly released data (these data are only understandable with the accompanying open-ended responses).

## **VIII. Compliance Data**

All data fields collected only for Compliance will not be released. This includes summary financial ratios calculated by CIIS and NMTC eligibility criteria.

Related entity information, QLICI level, all better rates and terms information, and all areas of higher distress data will be released without modification.

These data do not constitute information likely to cause substantial harm to the competitive position of the business.