



**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 current application form is being transferred to a CDFI Fund-managed web-based application portal beginning in fiscal year 2016 and will be used by CDFI Program, Native American CDFI Assistance (NACA), and Healthy Food Financing Initiative (HFFI) applicants to apply for assistance. HFFI applications are consolidated within CDFI and NACA Program applications. 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 all application materials, except the Standard Form 424 (SF-424), through a CDFI Fund-managed web-based application portal. The SF-424 will be submitted through Grants.gov. 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 will be submitted in the CDFI Fund-managed web-based portal except for the SF-424 which will be submitted in Grants.gov.

4. Efforts to identify duplication

The CDFI Program application does not request information that is publically available from other Federal agencies other than a small amount of information from insured depository institutions and insured credit unions.

5. Impact on small entities

This collection of information 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 and NACA 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

Comments on the CDFI and NACA Program application were solicited in the Federal Register on February 11, 2015 (80 FR 7682). The CDFI Fund received four responses. The majority of the responses were overwhelmingly supportive of allowing applicants to enter CDFI and NACA Program application information in a CDFI Fund-managed web-based application portal since it will reduce burden. Please see Appendix 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 CDFI and NACA Program application process. No other assurances of confidentiality have been provided.

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.

The hour estimate is based on the 451 applicants that applied for funding in FY 2014 using the CDFI and NACA Program application and the estimated number of hours the FY 2016 application form should require. The estimated hours for completing the FY 2016 application are compared to the number of hours required to complete the existing collection tools.

The FY 2016 application is an integrated web-based collection tool that automatically populates fields and will store previously supplied information. In combination, these changes should reduce the applicant's burden hours from 50 hours in the current application to 30 in the FY 2016 CDFI and NACA Program application.

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 cost to the Government is the CDFI Fund staff and contractor time required to develop the application, review submitted applications, collect follow-up information from applicants, and report the results.

15. Any program changes or adjustments

The FY 2016 CDFI and NACA Program application introduces an integrated web-based collection tool that will now be used to collect data from CDFI and NACA Program applicants. The new interactive, integrated application reduces the burden on the applicant since it will store previously supplied information, which will reduce data entry in future applications. It is anticipated that this will decrease the amount of time to complete the application from 50 hours to 30 hours per response for the applicants. This revision reflects a decrease in hours due to the new collection tool. Total burden hours requested for this submission is 13,530 (451 applications X 30 hours an application).

16. Plans for information tabulation and publication

Confidential or proprietary information collected through the application will not be published.

17. Reasons for not displaying expiration date of OMB approval

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

18. Explanation of exceptions to certification statement

Not applicable.

***Collections of Information Employing Statistical Methods***

Not applicable.

## Appendix A

Date of Comment	Author Name	Author Position	Organization	File Name	Category	Comment	CDFI/NACA Program Office Response
4/9/2015	Ruth Barber & Lolita Sereleas	Partner and Founding Partner	Fund Consulting	20150409 - Ruth Barber Lolita Sereleas - FUNDConsulting	Burden	Recommends that the new web-based application be kept in an Excel format to allow CDFI & NACA Program applicants to copy and paste data from internal spreadsheets to reduce burden.	The CDFI Fund will not be utilizing Excel documents since the web-based portal is expected to reduce the time needed to complete applications since certain data fields will pre-populate.
4/9/2015	Ruth Barber & Lolita Sereleas	Partner and Founding Partner	Fund Consulting	20150409 - Ruth Barber Lolita Sereleas - FUNDConsulting	Burden	Concerned that having applications come in through Grants.gov and a CDFI Fund web-based portal will create confusion. Recommends that the CDFI Fund provide clear submission instructions.	Adopted recommendation.
4/13/2015	Mark Pinsky	President/CEO	Opportunity Finance Network	20150413 - Mark Pinsky - OFN	Burden	Recommends that the CDFI Fund produce documents that reference application information consistently since information can be found in application documents, OMB regulations, and other sources.	The CDFI Fund is taking all comments under consideration.
4/13/2015	David Beck	Chair	CDFI Coalition	20150413 - David Beck - CDFI Coalition	Burden	Recommends that the CDFI Fund consider how previously submitted application information can be replaced since data will pre-populate from previous applications.	The CDFI Fund is taking all comments under consideration.

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Date of Comment	Author Name	Author Position	Organization	File Name	Category	Comment	CDFI/NACA Program Office Response
4/8/2015	Terry Ratigan	Senior Consultant	National Federation of Community Development Credit Unions	20150408 - Terry Ratigan - NFCDCU	Burden	Concerned that credit union applicants are not receiving enough awards in proportionality to the overall CDFI Program applicant pool.	The CDFI Fund is taking all comments under consideration.
4/8/2015	Terry Ratigan	Senior Consultant	National Federation of Community Development Credit Unions	20150408 - Terry Ratigan - NFCDCU	Burden	Concerned that some CDFI & NACA Program applicants may have problems submitting applications in Grants.gov and the CDFI Fund web-based portal due to technical issues. Recommends providing training and support to mitigate any issues and revisit the process at the end of the fiscal year 2016 CDFI & NACA Program application process.	Adopted recommendation.
4/8/2015	Terry Ratigan	Senior Consultant	National Federation of Community Development Credit Unions	20150408 - Terry Ratigan - NFCDCU	Burden	Recommends separate application processes for CDFI institution types and for greater use of regulatory reports for CDFI banks and credit unions.	The CDFI Fund is taking all comments under consideration.
4/8/2015	Terry Ratigan	Senior Consultant	National Federation of Community Development Credit Unions	20150408 - Terry Ratigan - NFCDCU	Burden	Recommends automating CDFI certification and recertification applications which would reduce the amount of data needed for CDFI & NACA Program applications.	The CDFI Fund is taking all comments under consideration.

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4/8/2015	Terry Ratigan	Senior Consultant	National Federation of Community Development Credit Unions	20150408 - Terry Ratigan - NFCDCU	Burden	Recommends integrating CIIS, CDFI certification, and CDFI Program application databases.	The CDFI Fund is taking all comments under consideration.
4/8/2015	Terry Ratigan	Senior Consultant	National Federation of Community Development Credit Unions	20150408 - Terry Ratigan - NFCDCU	Burden	Recommends integrating CIIS, CDFI certification, and CDFI Program application databases.	The CDFI Fund is taking all comments under consideration.
4/8/2015	Terry Ratigan	Senior Consultant	National Federation of Community Development Credit Unions	20150408 - Terry Ratigan - NFCDCU	Burden	Recommends enhancing and updating the myCDFI mapping program to incorporate more layers of information and increase the capacity of the myCDFI mapping program to process larger batch files.	The CDFI Fund is taking all comments under consideration.
4/8/2015	Terry Ratigan	Senior Consultant	National Federation of Community Development Credit Unions	20150408 - Terry Ratigan - NFCDCU	Burden	Recommends providing technical assistance to develop an interface that would enable regulated CDFIs to generate all CDFI Fund compliance reports from their core data processing systems.	The CDFI Fund is taking all comments under consideration.