

Community Development Financial Institutions Fund, Department of the Treasury

Supporting Statement for Paperwork Reduction Act Submissions  
Community Development Financial Institutions Fund (CDFI Fund)  
Community Development Financial Institutions (CDFI) Program and Native American CDFI  
Assistance (NACA) Program Application, 1559-0021

**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 forms were modified to reflect comments received during the 60-day public comment period required under the Paperwork Reduction Act (PRA). The CDFI Fund received 243 comments on the Financial Assistance (FA) application and 23 comments on the Technical Assistance (TA) application for a total of 266 comments. Modifications reflect appropriate changes to the application based upon the CDFI Fund's review and adjudication of the public comments. Most changes were made to provide more clarity to intended users. The information collected will be used to select award Recipients based on a merit-based selection process. The requested information is required by the CDFI Program regulations (12 CFR Part 1805) and respective Notices of Funds Availability.

**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 through a CDFI Fund-managed web-based application portal with the exception of Standard Form 424 (SF-424). The SF-424 must 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**

The CDFI Fund only accepts electronic applications unless an applicant receives advance written permission from the CDFI Fund to submit in another format. All application materials must be submitted in the CDFI Fund-managed web-based portal except for the SF-424 which must 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. A small amount of information is available 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(s) through the Community Investment Mapping System (CIMS). This system allows applicants 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 and/or NACA Program. This effort is 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 July 12, 2016 (81 FR 133). There were 11 respondents to the solicitation and 266 comments. The majority of the comments were related to clarifications of questions, redundant or repetitive questions, and recommendations on improvements of data entry into the CDFI Fund managed web-based application system.

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 this information collection. No personally identifiable information (PII) is collected.

12. Estimate of the hour burden of information collection.

The burden estimate is based on approximately 400 applicants completing the FA Application in 100 hours for a subtotal of 40,000 hours and 100 applicants completing the TA Application in 50 hours for a subtotal of 5,000 hours. Therefore, the estimated total number of burden hours for the application is 45,000.

13. Estimate of total annual cost burden to respondents

This collection does not have a cost burden to respondents. No purchases of equipment or services are necessary for this information collection.

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 2017 CDFI Program and NACA Program applications introduce modified applicant questions to better align with statutory requirements of the CDFI Program. The applications are more streamlined and have fewer questions. It is anticipated that these changes will reduce the burden hours per application. It is important to note that the most recent Information Collection Request (ICR) that concluded on 12/1/2015 included inaccurate burden estimates. The previously reported total burden hours was 13,500. The CDFI Fund has more accurate data on burden hours provided by applicants based on how many hours it took to complete the previous application. Based on this data, the CDFI Fund estimates it took applicants an average of 163 hours to complete the previous FA Application for a subtotal of 65,200 hours assuming 400 FA. Additionally, it took TA applicants an average of hours to complete the previous TA application for a subtotal of 10,000 hours assuming 100 TA applications. Therefore, a more accurate estimate of the total burden hours for the previous ICR is 75,200 hours and not 13,500 as currently indicated in ROCIS. It is anticipated that the amount of time for applicants to complete the new FA Application will decrease from an average of 163 hours to 100 hours and from 100 to 50 hours for the TA application. This revision reflects a decrease in hours due to reduction in the number of questions in the application.

16. Plans for information tabulation and publication

Confidential or proprietary information collected through this information collection 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.

**B. Collections of Information Employing Statistical Methods**

Not applicable.

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**Financial Assistance Application**

<b>Date of Comment</b>	<b>Author Name</b>	<b>Author Position</b>	<b>Organization</b>	<b>Category</b>	<b>Comment</b>	<b>CDFI/NACA Program Office Response</b>
8/19/2016	Lisa Wagner	Executive Director	Bluestem Consulting	concern	Character limit seems too short for management and staffing in AMIS	Character limit increase will be considered on a case by case basis.
8/19/2016	Lisa Wagner	Executive Director	Bluestem Consulting	recommendation	Thought that the current way of entering financial, lending and impact data one cell at a time, created significant opportunities for error and would like to see an option for attaching an excel spreadsheet instead.	The CDFI Program's web-based application portal does not have the capacity to do this.
9/10/2016	Katherine Forth		Cinnaire Lending	recommendation	For each chart required in AMIS an equivalent excel chart	The CDFI Program will provide a template in Excel that applicants can use offline.
9/10/2016	Katherine Forth		Cinnaire Lending	recommendation	Suggestion was made to have external testers for AMIS screens, formulas and charts	This testing is undertaken by the CDFI Fund and its contractors.
9/9/2016	Jeannine Jacokes	CEO	Community Development Bankers Association	recommendation	A limit of 2,000 character should be provided for each individual under staff and board members. Application should allow for more than 5 boards members to be listed. The narrative column titled accountability to the TM should be labeled skills and expertise.	The CDFI Program will consider character limit increases on a case by case basis.
9/9/2016	Jeannine Jacokes	CEO	Community Development Bankers Association	recommendation	Management changes drop down should be expanded to offer 1,000 characters for each senior leadership change. Alternatively, a general	Character limit increase will be considered on a case by case basis.

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					narrative response may be more appropriate for this type of question	
9/9/2016	Jeannine Jacokes	CEO	Community Development Bankers Association	recommendation	MAPS scores should be averaged over 3 historic years and AMIS should be able to provide this calculation in real time as an applicant is inputting the data into the system.	The CDFI Program will require 3 years of data. The CDFI Program's web-based application portal currently does not have the capability to calculate average MAPS scores in real time. The CDFI Fund will take this comment into consideration.
9/9/2016	Jeannine Jacokes	CEO	Community Development Bankers Association	recommendation	AMIS financial dropdown-the 3rd should be reworded to say what type of portfolio management system does the CDFI use	The CDFI Fund will take this comment into consideration.
9/9/2016	Jeannine Jacokes	CEO	Community Development Bankers Association	recommendation	To reduce data entry error, AMIS should allow excel spreadsheet upload and/or import of data. AMIS should be able to allow for auto populated information from previous applications	The CDFI Program's web-based application portal does not have the capability to upload data from Excel files. However, the application portal does allow previous data to auto populate.
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	recommendation	Add help text for the terms listed in the chart- Add help text for the terms listed in the chart, especially for: o Total Net Assets Available for Financingo Total Interest Income (only from lending?) o Fee Income (only from lending?)	The CDFI Program will provide definitions in the application and guidance materials.

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					<ul style="list-style-type: none"> <li>o Total Grants and Contributions (should be interest/fee?)</li> <li>o Total Pre-tax Operating Expense (include interest or provision for bad debt)</li> <li>o Restructured Loans (need definition of this and does this include any loans they've made changes to or that were troubled and had to restructure?)</li> <li>o Total Delinquent Loans/Total Loans Delinquent 31 to 60 days &amp; Total Loans Delinquent 61 to 90 days</li> <li>o First-Time Account Holders – TA would have done this not lending – or is this a credit union typo</li> <li>o Total Net Assets Available for Financing</li> <li>o Total Interest Income (only from lending?)</li> <li>o Fee Income (only from lending?)</li> <li>o Total Grants and Contributions (should be interest/fee?)</li> <li>o Total Pre-tax Operating Expense (include interest or provision for bad debt)</li> <li>o Restructured Loans (need definition of this and does this include any loans they've made changes to or that were troubled and had to restructure?)</li> <li>o Total Delinquent Loans/Total Loans Delinquent 31 to 60 days &amp;</li> </ul>	

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					Total Loans Delinquent 61 to 90 dayso First-Time Account Holders – TA would have done this not lending – or is this a credit union typo?	
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	clarification	For “Enter Other Impacts” it may be helpful to provide some examples if the Fund really wants applicants to enter this information.	The CDFI Program will provide further clarification in the application and guidance materials.
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	clarification	For the New Data Points for Application piece, does this help the Fund’s understanding of CDFIs financial systems? Also, adding help text for these data points would be helpful, especially for the following terms. o Financing Capital Detail (off balance sheet assets for lending?) o Define non-performing assetso Define nonaccrual loanso Cash Restricted for Operations (restricted by accounting or by Board?) o Operating Revenue and Operating Expenses (be clear what makes up these numbers)	The CDFI Program will provide definitions in application and guidance materials.
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	clarification	For Loans/Financing/Loan Guarantees/Financial Services Currently Offered table, should add definitions for business and microfinance loans.	The CDFI Program will provide definitions in application and guidance materials.
9/9/2016	Chrystel		First Nations	recommendation	For the Development Services	The CDFI Fund will take

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	Cornelius/ Tanya Fiddler		Oweesta Corporation/ Native CDFI Network		Currently Offered table, can the application add “& Training” to the first bullet; “& Coaching” to the second bullet; “Technical Assistance & Training” to the third bullet; and “& Training” to the fourth bullet.	this comment into consideration.
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	recommendation	For the Activity Levels Chart, define affordable housing	The CDFI Program will provide definitions in application and guidance materials.
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	clarification	For the Key Staff table, for years of experience, add more clarification. This confuses applicants. Also, maybe consider condensing to a drop down list of skills or checkboxes for skills in the role in implementing your strategic goals section.	The CDFI Program will provide further clarification in in the application and guidance materials.
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	clarification	For Board Members table – clarify what Years of Experience means. Add help text around accountability to the target market – the text under that doesn’t match what is being asked.	The CDFI Fund will take this comment into consideration.
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	recommendation	For the Committees table – necessary to ask for combined total years of experience from members? We recommend cutting that question unless it is particularly helpful for the Fund in some way. Can be a	Adopted recommendation.



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					confusing question for applicants.	
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	recommendation	Under the AMIS Management Dropdown Questions, the 1,000 character limit is too short. If there's a change in governance structure, adverse legal action, or change in senior leadership, it would be beneficial to adequately explain why the change happened. Any of these changes would be significant and worth allowing AT LEAST 2,000/3,000 characters	The CDFI Fund will take this comment into consideration.
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	recommendation	Projected Activity Levels Chart – define affordable housing.	The CDFI Program will provide definitions in application and guidance materials.
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	recommendation	AMIS management questions seem repetitive from the CDFI certification report	It is the intent of the CDFI Program to eliminate questions that are addressed in the annual certification in future years when this capability has been implemented.
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	CHART: AMIS Management and Dropdown Questions <ul style="list-style-type: none"> <li>• The chart should be expandable to offer 1,000 characters for EACH senior leadership change.</li> <li>• A catch-all question allowing the applicant to identify any other</li> </ul>	The CDFI Fund will take this comment into consideration.

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					material change as set forth in the Assistance Agreement should be included, even if it is based on the prior year's Assistance Agreement.	
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	<p>CHART: AMIS Financial Dropdown Questions</p> <ul style="list-style-type: none"> <li>• The dropdown chart should allow for an explanation when audited financial statements are not prepared within 180 of the FYE. Smaller CDFIs may wait in order to secure favorable pricing; Native CDFIs may need to wait for information from tribal entities so there are acceptable reasons for such a delay.</li> </ul>	The CDFI Program will take this comment into consideration.
9/12/2016	Dafina Williams	Vice President, Public Policy	Opportunity Finance Network	recommendation	<p>AMIS, remains confusing for CDFI applicants to navigate, especially if multiple staff are working together to complete the application. CDFIs in our network overwhelmingly requested that in each section where data will be entered through AMIS, the Fund include a corresponding, downloadable Excel spreadsheet that applicants can use outside AMIS, to gather and assess their data before entering it into the online system. The Excel sheet should include the same calculations the AMIS system will use to compute financial information so applicants can</p>	The CDFI Program will provide a template in Excel that applicants can use offline.

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					<p>understand how key ratios and other information is being calculated, and identify any potential inaccuracies. This will substantially reduce the burden on applicants as they can gather and analyze data in a functional format before the transfer into the AMIS system, which does not present the chart data in a concise format. This would also facilitate sharing information when multiple staff members are working in AMIS. The Fund should also consider providing additional training and support on AMIS to improve the experience for applicants.</p>	
9/12/2016	Ben Sones/Holly R. Logue	Members	FI Strategies	concern	<p>Because many audit reports do not neatly separate general industry guidance from audit findings, some of the AMIS Financial Dropdown Questions will be difficult for many Applicants to answer.</p>	<p>The CDFI Program will take this comment into consideration.</p>
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	concern	<p>Under the AMIS Management Dropdown Questions, the 1,000 character limit seems too short.</p>	<p>Character limit increase will be considered on a case by case basis.</p>
9/9/2016	Chrystel Cornelius/ Tanya		First Nations Oweesta Corporation/	clarification	<p>For the Key Staff table, for years of experience, add more clarification. This confuses applicants. Also,</p>	<p>Adopted recommendation.</p>

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	Fiddler		Native CDFI Network		maybe consider condensing to a drop down list of skills or checkboxes for skills in the role in implementing your strategic goals section.	
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	clarification	For Board Members table – same comment on clarifying what Years of Experience means. Also, add help text around accountability to the target market – the text under that doesn’t match what is being asked.	Adopted recommendation.
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	clarification	For the Committees table – what does combined total years of experience from members tell the Fund?	The CDFI Program will remove Combined Years of Experience information request from the Committees Table.
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	recommendation	For the next table, AMIS Management Dropdown Questions, add help text for governance structure and management information system.	The CDFI Program will provide further clarification in in the application and guidance materials.
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	recommendation	For the next table, the AMIS Financial Dropdown Questions: o “Are externally reviewed financial statements or audited financial statements completed annually within 180 days of the fiscal year end?” For the possible responses, maybe add “plan to” and an option to explain if they answer no. o “If no to prior question, how frequently is	The CDFI Program will take all comments into consideration.

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					<p>the CDFI required by its policies and procedures to self-evaluate and track performance on PG&amp;Ms?” Add help text for PG&amp;Ms.</p> <ul style="list-style-type: none"> <li>o What is Enterprise accounting software? Is this just any accounting software? We are not aware of any CDFI that doesn’t use accounting software so we’re not sure how useful this question will be. The issue is whether or not applicants use it effectively.</li> <li>o A-133 audits often take longer than 180 days. We hope if a larger CDFI that is required to have an A-133 audit will not be docked points because it takes longer than 180 days.</li> <li>o Need to define “third-party funders” when asking about covenants. Or just remove the “third-party” if referring to all funders.</li> <li>o If a CDFI says that it has had one or more missed or overdue payments to a funder maybe they should be provide an opportunity to explain. Sometimes there are extenuating circumstances and it is not a systemic problem.</li> </ul>	
9/9/2016	Chrystel Cornelius/		First Nations Oweesta	concern	In the FY2016 application, applicants were required to enter all	Applicants will need to enter this information into

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	Tanya Fiddler		Corporation/ Native CDFI Network		financial, lending, and impact projections one cell at a time into AMIS. We believe this created significant opportunity for error in applications and took a significant amount of time to enter and then check and double check. Since the Fund does not need this information for tracking (like it does actual historical information), it would be much more efficient and accurate if applicants could just attached an excel workbook for the projections, as applicants have in years prior to 2016.	the CDFI Program's web-based application portal.
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	recommendation	For the Development Services Currently Offered table, can the application add “& Training” to the first bullet; “& Coaching” to the second bullet; “Technical Assistance & Training” to the third bullet; and “& Training” to the fourth bullet.	The CDFI Program will provide further clarification in the application and guidance materials.
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	CHART: Financing/Loan Guarantees/Financial Services Currently Offered• The title of the chart includes loan guarantees but that entry is not listed in the chart. We recommend that there be a loan guarantee entry for each type of loan. • The chart should be expanded to include equity investments in each	The CDFI Program will take all comments into consideration. The CDFI Program will provide further clarification in the application and guidance materials and through its web-based application portal.

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					<p>category. • Business loans should be broken out by type (working capital, equipment, inventory, real estate) and by dollar size (\$50,000 or under and above \$50,000 to correspond to the most frequently used small business versus microloan categories of loans within the CDFI field). • It is not clear what an “intermediary” loan is or why this categorization is important as a matter of evaluating the strength and performance of an FA applicant. If it is a loan from a CDFI that devotes 50% or more of its lending to other CDFIs, that is not a particularly helpful way to understand the composition of the applicant’s loan portfolio. Regardless of whether the applicant makes loans to other CDFIs, the purpose of those loans is more descriptive. We would also note that there are very few such lenders. In addition, “loans to non-profits” should be similarly broken out by type of loan – community facility, non-profit developer, etc. • Residential real estate loans should be broken out between for sale and rental, and single and multifamily to give a more accurate picture of the</p>	

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					<p>portfolio. The risks attendant to these 4 categories are quite different. There should be an overall category for each of the 4 types together with a subset to the extent the lending is for affordable housing. There should be a definition of affordable housing; we suggest that for single family it be a home whose sale will be for no more than 80% of AMI and for multifamily at least 20% of the units should be contractually dedicated to units that will be rented for no more than 80% of AMI.</p>	
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	<p>CHART: Activities Level Chart• Commercial facilities loans should be broken out separately from small business and microenterprise, as it is done on the previous chart and the 4 types of commercial real estate loans should be similar in both charts. • This chart suggests that Intermediary lending is to non-profits and CDFIs. The definition needs to be consistent; however, as noted above, we suggest that loans be categorized by type of loan not the type of borrower. • The categories of the Activities Level Chart should match those on the Loans/ Financing/Loan Guarantees/Financial Services</p>	The CDFI Program will take all comments into consideration.



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					<p>currently offered in the chart. • Applicants should be able to add individualized/unique activities that they have determined are relevant to their business plans.</p>	
9/12/2016	James R. Klein	Chair	CDFI Coalition		<p>CHART: Demographic Information</p> <ul style="list-style-type: none"> <li>• Item number 3 calls for demographic information in chart form. The third bullet indicates that “AMIS responses are not scored by external reviewers; AMIS responses are evaluated by the CDFI Fund staff for evaluation context and for award prioritization by statutory requirements”. Statutory requirements should be clearly set forth in the review criteria and the weighting that will be afforded each element, and as noted above this should be published for public comment.</li> <li>• We also believe that it will not be possible for third- party reviewers to adequately assess narrative responses without also evaluating the information in the charts. Thus, while third party reviewers may not be asked to “score” the charts, they should be asked to take the chart data into account in fully evaluating and scoring the related narrative</li> </ul>	<p>The CDFI Program will take all comments into consideration. The CDFI Program will provide further clarification in the application and guidance materials and through its web-based application portal.</p>

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					responses.	
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	<p>CHART: Client/Beneficiary Data for Most Recently Completed Fiscal Year• Applicants should list the number of “clients” – that is, borrowers, separately from the number of beneficiaries in the case of affordable housing, community facilities and business loans. The Fund should define what constitutes a beneficiary for affordable housing – just those units that are restricted to residents earning less than 80% of AMI, or all residents? In addition, the Fund should define how various types of community facilities are to count beneficiaries. For example, for health care facilities, is there any income restriction, and if not, is it measured by distinct patient visits a year? In the case of pre-development loans, how are such figures to be established? For businesses, number of low income employees and/or employees living in low income communities should be included.</p>	<p>The CDFI Program will separate "clients" and "beneficiaries" and provide further clarification in the application and guidance materials.</p>
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	<p>CHART: Race/Ethnicity Characteristics of Targeted Populations, if Applicable</p> <ul style="list-style-type: none"> <li>• Does this chart refer to the clients</li> </ul>	<p>The CDFI Program will provide further clarification in the application and guidance</p>

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					served in the last year, as the previous chart does, or is it referring to the profile of the entire Target Market?	materials.
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	<p>CHART: Target Market Client/Beneficiary Data for Most Recently Completed Fiscal Year</p> <ul style="list-style-type: none"> <li>• The clients and the beneficiaries should be separately reported as discussed above.</li> <li>• Currently, expanding Target Markets is an uncertain process and many CDFIs have loans in markets for which the Fund has not yet approved the expansion. Accordingly, this chart should be expanded to include other markets for which Target Market status has been requested to more accurately convey the totality of a CDFI's work.</li> <li>• It is not clear whether the chart is asking for information on the applicant's portfolio or for the profile of the residents of the Target Market. We suggest it focus on the applicant's portfolio.</li> </ul>	The CDFI Program will separate "clients" and "beneficiaries" and provide further clarification in the application and guidance materials.
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	CHART: Income Characteristics of all Clients/Beneficiaries Served There should be separate entries for the clients (borrowers) and	The CDFI Program will provide further clarification in the application and guidance

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					<p>information for beneficiaries, if known. In the case of borrowers, incomes will be an essential piece of underwriting information. We suggest that client incomes be the client's alone and not based on family income. We do not believe it is appropriate to ask CDFIs to collect information on beneficiaries, for example users of a community facility. In many instances the CDFI loan may come at the pre-development stage before such information is known with a certainty. Even with respect to affordable housing, the affordable housing levels may not be fixed at the point in time of the loan, and as noted elsewhere, in mixed income housing as little as 20% may be affordable to low income families at or below 80% of AMI. Does the CDFI Fund want a good faith estimate of the other residents' income levels? This seems speculative.</p>	<p>materials.</p>
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	<p>CHART: US States/Territories in which you currently have Clients/Beneficiaries and Loans/Equity Investments</p> <ul style="list-style-type: none"> <li>• The chart should include financial</li> </ul>	<p>The CDFI Program will separate "clients" and "beneficiaries" and provide further clarification in the application and guidance</p>

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					<p>guarantees as well as loans/equity investments.</p> <ul style="list-style-type: none"> <li>• Since the chart does not call for enumeration of clients or beneficiaries they should be deleted from the chart title.</li> <li>• Make it clear that the chart should encompass ALL locations, including those in states or territories that are not yet incorporated into the CDFI's Target Market</li> </ul>	<p>materials.</p>
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	<p>CHART: Target Market Statistics for Most Recently Completed Fiscal Year</p> <ul style="list-style-type: none"> <li>• As the current Target Markets include Low Income Targeted Populations and Other Targeted Populations, it is not clear how the data in the fields should be developed. For example, if a CDFI has a 5 state Investment Area, it would be relatively easy to calculate the number of persons living in poverty in each state and weight an average by population in each state. However, for LITP and OTP, it is not clear how such calculations should be made if the applicant has a national Target Market. One possibility is for the applicant CDFI to average the data on the basis of its</li> </ul>	<p>The CDFI Program will provide further clarification in the application and guidance materials.</p>

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					actual existing LITP and/or OTP borrowers rather than use national data.	
9/12/2016	Terry Ratigan	Senior CDFI Specialist	National Federation of Community Development Credit Unions	concern	The first tables on pages 1 and 2 are identical, and it is not clear that the information requested is substantially different from the data already submitted with CDFI Annual Reports.	The requested data in the referenced charts will be entered in to the CDFI Program's web-based portal and any duplicate information requests among the two charts for the application portal will be eliminated.
9/12/2016	Terry Ratigan	Senior CDFI Specialist	National Federation of Community Development Credit Unions	concern	In its current form, this first table is difficult or impossible for most regulated CDFIs to complete.	The CDFI Program will take all comments into consideration.
9/12/2016	Terry Ratigan	Senior CDFI Specialist	National Federation of Community Development Credit Unions	recommendation	Given the critical importance of savings in helping consumers to achieve financial stability and security, and some of the innovative savings products and programs developed in recent years (e.g., reverse-tier and prize-linked savings), savings should be included as a product category	The CDFI Program will include "other" category for products that can be used to include this information.
9/12/2016	Terry Ratigan	Senior CDFI Specialist	National Federation of Community Development Credit Unions	recommendation	Financial Services should be listed in a separate table. The categories of financial services can be taken directly from the categories used for regulatory reports	The CDFI Program created a separate line item for Financial Services.

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9/12/2016	Ben Sones/Holly R. Logue	Members	FI Strategies	recommendation	Mission statement- We request that the character limit for this question be substantially increased or eliminated altogether.	The CDFI Program will consider character limit increases on a case by case basis.
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	clarification	This application has a duplicate Loans/Financing/Loan Guarantees/Financial Services Currently Offered table in this section.	The requested data in the referenced charts will be entered in to the CDFI Program's web-based portal and any duplicate information requests among charts used in the application portal will be eliminated.
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	recommendation	Activity Levels Chart – define affordable housing.	The CDFI Program will provide further clarification in the application and guidance materials.
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	recommendation	For the Client/Beneficiary Data for Most Recently Completed Fiscal Year table, it is very confusing the way it is structured. We recommend restructuring this table to a side by side design.	The formatting of all charts and tables displayed in the application document will appear differently in the CDFI Program's web-based application portal.
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	recommendation	For Race/Ethnicity Characteristics of Targeted Population or Populations, if applicable table, clarify OTP and notes on why their numbers may not equal 100%. Also, correct Native Alaskan to Alaska Native and Native America to Native American.	The CDFI Program will correct the typographical errors. The CDFI Program will provide further clarification in the application and guidance materials.

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9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	recommendation	Maybe make Target Market Client/Beneficiary Data for Most Recently Completed Fiscal Year table a side by side format too.	The formatting of all charts and tables displayed in the application document will appear differently in the CDFI Program's web-based application portal.
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	clarification	Gender and Other Characteristics for Most Recently Completed Fiscal year table is confusing. And what does other mean?	The CDFI Program will provide further clarification in the application and guidance materials.
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	recommendation	The Income Characteristics of all Clients/Beneficiaries Served for Most Recently Completed Fiscal Year table should include text or link to how the Fund wants these figures measured – what metrics is the Fund using? What would other be, high? If so, just say that. If the applications leaves it as other, move it to the bottom of the list. Should this add to 100%? Clarify for applicants.	The formatting of all charts and tables displayed in the application document will appear differently in the CDFI Program's web-based application portal. The CDFI Program will provide further clarification in the application and guidance materials.
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	recommendation	For the Target Market Statistics for Most Recently Completed Fiscal Year table, these figures could be difficult to calculate or the Fund should provide help text to calculate for those serving, for example, a tri-county area. How does the Fund want applicants to aggregate figures? Also, should include help text/link	The formatting of all charts and tables displayed in the application document will appear differently in the CDFI Program's web-based application portal. The CDFI Program will provide further clarification in the



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					for the metrics the Fund is using to measure this. And for the national Poverty, Income, Unemployment areas, should provide the national figures here. Also consider when groups have an OTP, what number they have for that group.	application and guidance materials.
8/10/2016	Dara Duguay	Executive Director	Credit Building Alliance	general	Recommends including credit reporting as a data collection point for CDFIs that lend directly to individuals and small businesses in the Uses of Award Report Form due to a belief that by doing so it would help customers to establish a credit score.	Comment is not applicable to the CDFI Program.
8/19/2016	Lisa Wagner	Executive Director	Bluestem Consulting	concern	concerned that A-133 audits may not be available within the application timeframe given that they take longer than 180	The CDFI Program believes this is a misunderstanding of the application question by the commenter. The CDFI Program will provide necessary clarification in the guidance and application materials.
8/19/2016	Lisa Wagner	Executive Director	Bluestem Consulting	concern	if applicant has one or more missed payments to funders they should be given the opportunity to explain	The CDFI Fund will take this comment into consideration.
9/10/2016	Katherine Forth		Cinnaire Lending	clarification	request further information on the scoring and review process	The CDFI Program will provide further clarification on scoring and review process in the

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						application and guidance materials.
9/10/2016	Katherine Forth		Cinnaire Lending	recommendation	clear definition for each type of loan and loan activity including but not limited to intermediary loans/lender, commercial loans, community facilities	The CDFI Program will provide definitions in application and guidance materials.
9/10/2016	Katherine Forth		Cinnaire Lending	recommendation	CDFI Fund should adopt an annual application calendar encompassing the Fund's various programs. The FA and capital magnet application overlapping presented challenges	The CDFI Program will take all comments into consideration.
9/9/2016	Jeannine Jacokes	CEO	Community Development Bankers Association	concern	Encourages the Fund to seek greater alignment and consistency in definitions across all of its program applications and various reporting systems. the FA application should be consistent with data requested in the TLR and ILR	The CDFI Program will take all comments into consideration.
9/9/2016	Jeannine Jacokes	CEO	Community Development Bankers Association	concern	Encourages greater consistency between its application data collection and reporting and the regulatory definitions and reporting standards applicable to regulated CDFIs.	The CDFI Program will take all comments into consideration.
9/9/2016	Jeannine Jacokes	CEO	Community Development Bankers Association	concern	strongly recommends that the Fund create applications and reporting requirements that are tailored by CDFI type	The CDFI program will provide further clarification in application and guidance materials.
9/9/2016	Jeannine Jacokes	CEO	Community Development	concern	Believes they are inconsistencies among the charts in the application	The formatting of all charts and tables displayed in the

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			Bankers Association		that could be confusing to applicants. The products and services chart ask applicants to select activities that are currently offered or to be offered. The categories outlined in these charts are inconsistent with the historic activity level chart in questions 2, 6 and 23. This is also inconsistent with the past award use in question 8 and proposed award use chart in question 5.	application document will appear differently in the CDFI Program's web-based application portal.
9/9/2016	Jeannine Jacokes	CEO	Community Development Bankers Association	clarification	across all three sets of charts, the loan category labels are inconsistent and confusing	The formatting of all charts and tables displayed in the application document will appear differently in the CDFI Program's web-based application portal.
9/9/2016	Jeannine Jacokes	CEO	Community Development Bankers Association	recommendation	recommends that the loan categories be amended to be consistent with the products and services charts	Adopted recommendation.
9/9/2016	Jeannine Jacokes	CEO	Community Development Bankers Association	clarification	confusion between eligible uses and loan products	The CDFI Program will provide further clarification in the application and guidance materials.
9/9/2016	Jeannine Jacokes	CEO	Community Development Bankers Association	recommendation	recommends 20% more character space across all narrative questions	The CDFI Program will consider character limit increases on a case by case basis.

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9/9/2016	Jeannine Jacokes	CEO	Community Development Bankers Association	recommendation	Recommend that the application deadline NOT be less than 60 days from publication of NOFA.	The CDFI Program will take all comments into consideration.
9/9/2016	Jeannine Jacokes	CEO	Community Development Bankers Association	recommendation	the Fund should commit to a standard application format for at least 2 years and announce dates ahead of time to allow potential applications time to plan	To the extent possible, the CDFI Program will try to make announcements ahead of time.
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	recommendation	Add help text for terms.	The CDFI Program will provide necessary clarification in the guidance and application materials and through the web-based application portal.
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	recommendation	Maybe provide some examples for other impacts.	The CDFI Program will take all comments into consideration.
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	recommendation	With the character limits, how about specifying points per section	The CDFI Program will provide further clarification the application and guidance materials.
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	recommendation	It's unclear why the Fund is focused on a product by product breakdown for the portfolio data, what's the relevance? Also, the products should relate to the purpose fields and the	The CDFI Program will investigate the need for providing this information particularly for future years

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					ILR/TLR. It would make it easier. Finally, there is a lack of breakdown of residential real estate. Usually it's about what loans are held not about other items in the organization's portfolio. We have loans from a long time ago – just asking for the data to be divided/sorted in a different way. Wish there was more of a relationship between the application, ILR/TLR, and the annual report for certification - that it flowed between all the different types of data that's collected similarly throughout.	
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	recommendation	To strengthen the case for and recognition of the challenges around access to capital on trust lands, should the portfolio identify borrowers on and off trust land too?	The CDFI Program will evaluate this as part of the review process and will include clarification in guidance.
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	concern	There's been a shift toward expansion – very deliberately asking about that. What is driving that?	The CDFI Program will provide further clarification the application and guidance materials.
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	recommendation	There should be a location to indicate Tribal affiliation for staff/Board members	The applicants can provide this information if they choose and the CDFI Program does not believe it should be a required field.
9/9/2016	Chrystel Cornelius/		First Nations Oweesta	concern	Since applicants have to provide audits, the questions around them	The CDFI Program believes that this question

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	Tanya Fiddler		Corporation/ Native CDFI Network		seem to be redundant	provides important and insight.
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	recommendation	From a short-term and long-term policy view, impacts should include trust versus non-trust lands and transactions. Challenge of access to capital is very different on trust lands. Since it's not represented on this application it takes away one of the tools Native CDFIs have to push forward on this issue.	The CDFI program will provide further clarification in application and guidance materials.
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	recommendation	Recognize peer-to-peer TA in addition to consultants	"Peer-to-peer" is also considered consulting. The CDFI Program will provide further clarification in the application and guidance materials
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	With respect to all charts – where data will be entered through AMIS, we request that each chart have a corresponding excel sheet that applicants can use, outside AMIS, to gather and assess their data before entering it into AMIS. This will substantially reduce the burden on applicants as they can gather and analyze data in a functional format before the transfer into the AMIS system, which does not present the	The CDFI Program will provide a template in Excel that applicants can use offline.

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					chart data in a concise format.	
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	Indicate the timeframe covered by each chart; currently there are no directions on the time periods covered.	Timeframe will be included in guidance and application
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	Solicit public comments on the scoring, weighting and review process. It is not clear from the published application how many points are in each section, and how reviewers will be instructed to score individual questions or sections	The CDFI Program will be more transparent with information surrounding scoring in the application and guidance materials.
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	We would like to understand and have input on the policies the CDFI Fund will implement to carry out making awards to achieve geographic diversity and institutional diversity.	The CDFI Program will take all comments into consideration.
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	update and publish a companion Glossary of Terms that uses consistent terminology across the funding applications, certification definitions, and CIIS reporting	The CDFI fund will provide definitions in application and guidance materials.
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	The preliminary discussion covers the eligible uses for CDFIs, for example, Loan Loss Reserves. The Chart by contrast lists various financial products. The chart should ask the applicant to list the percentage of the award that will be used for eligible uses, not for	The CDFI Program will update the chart and also provide further clarification in guidance.

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					specific types of financing activity. CDFIs cannot predict with the certainty the chart seems to imply the types of financing activity they will undertake. That discussion would be better left to a narrative, not a chart	
9/12/2016	James R. Klein	Chair	CDFI Coalition	clarification	CHART: Financial Assistance Objectives – Select all that apply	The CDFI Program will take this comment into consideration.
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	CHART: New U.S. States/Territories in which you will have Clients/Beneficiaries and Loans/Equity Investments• Loan Guarantees should be added to the list of activities, per earlier comments.• The accompanying material should make it clear that a CDFI will not be penalized for not being able to expand into new areas. The accompanying narrative should allow the applicant to address the steps it is taking to move into the new markets and how certain it is at the time of the application whether the plan is feasible, and what the alternative plan is if the planned strategy proves infeasible. The applicant should not be penalized if, after its best efforts, it is infeasible to accomplish the anticipated	The CDFI Program will take all comments into consideration.



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					expansion. • The chart calls for new states in which the applicant will have borrowers; this is not a small enough means of quantifying new markets since some CDFIs may expand by as little as a single census tract.	
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	CHART: Gender and Other Characteristics of NEW Targeted Population or Populations, if applicable	The formatting of all charts and tables displayed in the application document will appear differently in the CDFI Program's web-based application portal.
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	CHART: Race and ethnicity Characteristics of NEW Targeted Populations or Populations if applicable	The formatting of all charts and tables displayed in the application document will appear differently in the CDFI Program's web-based application portal.
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	CHART: Income Characteristics of NEW Targeted Population or Populations, if applicable • Applicants should be able to fill out these charts if they plan to reach new populations regardless of whether they are already certified for such populations. A CDFI may only apply for the new markets if it receives an FA award to fulfill the strategy and therefore should not be expected to already be certified to	The CDFI Program will provide further clarification in application and guidance materials.

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					<p>serve such populations</p> <ul style="list-style-type: none"> <li>• It should be made clear in the instructions that the charts are to be completed based on expected borrowers. Unless the CDFI is operating in a very homogeneous market, it will be difficult for an applicant to accurately project how many women or Hispanic borrowers will obtain loans. Also, if beneficiaries are expected to be covered they should be added as a separate data point and not confused with clients (borrowers)</li> </ul>	
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	<p>CHART: New Loans/Financing/Loan Guarantees/Financial Services to be offered</p>	<p>The formatting of all charts and tables displayed in the application document will appear differently in the CDFI Program's web-based application portal.</p>
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	<p>CHART: New Development Services to be offered.</p> <ul style="list-style-type: none"> <li>• There should be an “other” category with a small narrative entry for a description of those “other” development services</li> </ul>	<p>Adopted recommendation.</p>
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	<p>CHART: Projected Activity Levels Chart</p> <ul style="list-style-type: none"> <li>• Please see comments under similar charts in Executive Summary Section</li> </ul>	<p>The formatting of all charts and tables displayed in the application document will appear differently in the CDFI Program's web-</p>

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						based application portal.
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	<p>CHART: Previous CDFI Fund FA Award Uses</p> <ul style="list-style-type: none"> <li>• This should be limited to the last 3 years for which awards were received, or all awards within the last 5 years</li> </ul>	The CDFI fund will provide definitions in application and guidance materials.
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	<p>CHART: Projected CDFI Fund FA Award Uses</p> <ul style="list-style-type: none"> <li>• Similar to our comment on Eligible Uses in the Executive Summary section, these charts should relate to the eligible uses, e.g., Loan Loss Reserves, and not be required to relate the eligible uses to particular financing types. A fundamental element of the CDFI Fund's FA program is that the FA awards are fungible and not traceable to particular loans. CDFIs are required to show that the award went toward certain uses, but should not be required to further relate those uses to particular financings. The Fund could separately ask for a snapshot of portfolio activities in terms of financing types over the last 3 years and the projected 3 years of the award period to obtain such information. The financing activity types need to be amended per earlier</li> </ul>	The CDFI Program will update the chart and also provide further clarification in guidance.

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					comments in the Executive Summary	
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	CHART: Key Staff, Board Members, Committees• The number of key staff should be increased to 10 and the number of board members to 7.• The last column in each chart should offer at least 750 to 1,000 characters for an explanation• The Board chart is titled “accountability to the Target Market”, however, the information called for - a description of the individual’s capacity, skills and experience – is not how accountability is defined in the Certification policies. The column should be retitled “Board member relevant skills and experience.”	The CDFI Program will increase character counts and number of staff, board, and committee members.
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	CHART: Projected Activity Levels Chart • Please see comments in connection with Activity Level Chart in Executive Summary • Appendix – Financial Inputs for all Institution Types	The formatting of all charts and tables displayed in the application document will appear differently in the CDFI Program's web-based application portal.
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	There are no instructions regarding the information to be used with regard to the financial inputs. We suggest the CDFI Fund offer those organizations that consolidate their	This request cannot be accommodated due to Statutory requirements of the CDFI Program.

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					financial statements with those of mission –driven subsidiaries be permitted to include that data in the financial inputs to give the most complete picture of the applicant’s activities. In addition, as the Fund includes a line for depreciation expenses in the LLR, it should be included in the Financial Inputs as well	
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	We encourage the CDFI Fund to set up a process that allows for interaction between the CDFI Fund staff and the variety of CDFIs that will apply through the CDFI, NACA, and Technical Assistance applications. Written comments on the application alone may not sufficiently probe the issues that need to be resolved to create a high quality application. We found that the session the CDFI Fund conducted with industry representatives with respect to the annual CDFI report form to be very helpful as a means to discuss and clarify important issues	The CDFI Program will take all comments into consideration.
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	We recommend that the Fund invite CDFIs of differing sizes, types, and geographic Target Markets to “test” the charts prior to release of the	This testing is undertaken by the CDFI Fund and its contractors.

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					NOFA. Every year there are glitches in the charts/AMIS. A month of testing by half a dozen CDFIs (including a Native CDFI) could eliminate most of these prior to release of the formal application. Testing the charts by themselves would not give those CDFIs any unfair advantage and would be a service to all applicants	
9/12/2016	Terry Ratigan	Senior CDFI Specialist	National Federation of Community Development Credit Unions	concern	The application is structured as a lending competition, with little or no space to present data and narratives for a business strategy centered on financial services and development services. Although the CDFI Fund’s statutes specify that Financial Assistance must be used to provide “new Financial Products, Financial Services and/or Development Services; and/or increase the volume of current Financial Products, Financial Services and/or Development Services”, the application is focused only on products and excludes meaningful data and discussion related to services. Research has shown that financial services are often more important than loan products in	The CDFI Program will include separate lines items in tables for financial services. Other comments will be taken into consideration.

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					<p>promoting financial inclusion among very low income consumers, a key goal of Treasury Secretary Lew. Many regulated CDFIs use services as the key tool for expansion strategies in CDFI Target Markets, yet the proposed application does not collect sufficient information for the CDFI Fund to make award decisions on that basis. These concerns have been raised in prior comment letters submitted to the CDFI Fund, most recently in our letter of December 2015 which provided specific recommendations for the collection and assessment of data related to Financial Services and Development Services. A copy of that letter is attached for your reference</p>	
9/12/2016	Terry Ratigan	Senior CDFI Specialist	National Federation of Community Development Credit Unions	recommendation	<p>In addition, the Federation notes that the process used to review and score applications is at least as important as the format of the application itself. For this reason, we have attached to a copy of the Federation’s comment letter of November 2015 that included the following recommendations:                      - Substantive debriefings for all applicants, successful and</p>	<p>The CDFI Program will take all comments into consideration.</p>

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					<p>unsuccessful alike.                      - Improved consistency in scoring quantitative data                      - Increased diversity and training of application reviewers.</p>	
9/12/2016	Terry Ratigan	Senior CDFI Specialist	National Federation of Community Development Credit Unions	recommendation	<p>The structure of the proposed application implies that only business strategies that center on loan products will meet the objectives of the CDFI Program and that FA may only be awarded for lending activities. If the FA competition remains focused almost exclusively on Financial Products, then we recommend that the CDFI Fund open additional competitions that focus on financial inclusion and asset building. However, if this competition remains the sole means to allocate Financial Assistance to meet the statutory requirements of the CDFI Program, then the application must be revised to collect clear and meaningful information on Financial Services and Development Services and allow CDFIs to compete on the basis of these activities as well.</p>	<p>The CDFI Program will take all comments into consideration.</p>
9/12/2016	Dafina Williams	Vice President, Public	Opportunity Finance Network	recommendation	<p>Removing the combined years of experience data point, as it provides no qualitative information about the</p>	<p>The CDFI Program will remove Combined Years of Experience information</p>



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		Policy			relevance and quality of that experience; and	request from the Committees Table.
9/12/2016	Dafina Williams	Vice President, Public Policy	Opportunity Finance Network	recommendation	Increasing the character limit in this section from 500 to 750 to allow sufficient space for organizations to explain each individual's capacity.	The CDFI Program will increase character counts and number of staff, board, and committee members.
9/12/2016	Dafina Williams	Vice President, Public Policy	Opportunity Finance Network	concern	This year's overlapping timeline for several Fund program applications created challenges for many organizations. This has a disparate negative impact on small CDFIs who have limited staff capacity and may not have the resources to complete multiple applications at once.	The CDFI Program will take all comments into consideration.
9/12/2016	Dafina Williams	Vice President, Public Policy	Opportunity Finance Network	recommendation	OFN recommends that the Fund add "hints" and "tips" to the proposed application to provide helpful guidance for applicants similar to the technique used currently in the New Markets Tax Credit application. The application should also define any new terms and data points. OFN also strongly recommends the Fund conduct outreach to potential applicants to explain the changes in the new application, ideally before the FY 2017 application period opens so that CDFIs can focus on preparing strong applications rather than attempting to navigate the new	The CDFI Program will take all comments into consideration.

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<b>Date of Comment</b>	<b>Author Name</b>	<b>Author Position</b>	<b>Organization</b>	<b>Category</b>	<b>Comment</b>	<b>CDFI/NACA Program Office Response</b>
					system	
9/12/2016	Ben Sones/Holly R. Logue	Members	FI Strategies	concern	There are a number of “Lines of Business” charts and “Activity Levels” charts interspersed throughout the Proposed Application. These charts are not consistent and contain different categories of loan products	The formatting of all charts and tables displayed in the application document will appear differently in the CDFI Program's web-based application portal.
9/12/2016	Ben Sones/Holly R. Logue	Members	FI Strategies	recommendation	We request that the Proposed Application be revised by either (1) requiring a single, consistent set of lines of business / activities in all applicable charts or (2) providing a consistent, flexible “drop-down” menu of activities in all charts so that Applicants may choose the activities most suitable to the particular Applicant’s business.	The formatting of all charts and tables displayed in the application document will appear differently in the CDFI Program's web-based application portal.
9/12/2016	Ben Sones/Holly R. Logue	Members	FI Strategies	recommendation	We request that there be uniformity across the various CDFI programs and platforms with regard to the lines of business / activities categories the CDFI Fund recognizes.	The CDFI Program will take all comments into consideration.
9/12/2016	Dafina Williams	Vice President, Public Policy	Opportunity Finance Network	recommendation	The Fund should not require CDFIs to provide the same data multiple times in one year, and should allow CDFIs to use existing reporting information already submitted to the Fund to meet this requirement. At a minimum, applicants should be able	It is the intent of the CDFI Program to eliminate questions that are addressed in the annual certification in future years when this capability has been implemented.

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					to upload into AMIS the previous year's Use of Award reporting form.	
9/12/2016	Dafina Williams	Vice President, Public Policy	Opportunity Finance Network	recommendation	Increasing the number of Key Staff from seven to ten, and the number of Board Members from five to seven;	The CDFI Program will increase character counts and number of staff, board, and committee members.
9/12/2016	Dafina Williams	Vice President, Public Policy	Opportunity Finance Network	clarification	Should clarify the time period for which the applicant is expected to enter information, as entering information from one fiscal year is far less burdensome than providing data for the previous five years. Our Members also expressed appreciation to the Fund for keeping the three "Other" impact fields in the Appendix.	The CDFI Program will provide further clarification in the application and guidance materials.
9/12/2016	Terry Ratigan	Senior CDFI Specialist	National Federation of Community Development Credit Unions	concern	The application has no tables dedicated to data on Financial Services, and instead asks applicants in several places to combine data on financial products and services in the same line.	The CDFI Program created a separate line item for Financial Services.
9/12/2016	Terry Ratigan	Senior CDFI Specialist	National Federation of Community Development Credit Unions	concern	The tables on pages 1-3 emphasize lending and provide little room to describe the depth and breadth of financial services	The CDFI Program will take all comments into consideration.
9/12/2016	Terry Ratigan	Senior CDFI Specialist	National Federation of Community Development	concern	The Activities Level Chart omits many critical activities that are eligible for Financial Assistance	The CDFI Program will take all comments into consideration.

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			Credit Unions			
9/12/2016	Terry Ratigan	Senior CDFI Specialist	National Federation of Community Development Credit Unions	recommendation	Our letter of December 2015, the Federation included a detailed proposal for data that could be included to better capture the scale and scope of financial services, lending and development services activities. We have attached a copy of this letter for reference	The CDFI Program will take all comments into consideration.
9/12/2016	Terry Ratigan	Senior CDFI Specialist	National Federation of Community Development Credit Unions	concern	The application does not allow sufficient narrative space to describe strategies focused on the delivery of high-impact financial services or development services	The CDFI Program will take all comments into consideration.
9/12/2016	Dafina Williams	Vice President, Public Policy	Opportunity Finance Network	concern	Concerns about the “Activities Level” chart on page three. The categories of information requested in this chart are inconsistent with the categories in the previous “Financing/Loan Guarantees/Financial Services Currently offered” charts, causing unnecessary confusion. OFN recommends Commercial Facilities loans be separated from Small Business and Microenterprise loans, as is done in the previous chart, and that the four types of commercial real estate loans be consistent in both charts.	The formatting of all charts and tables displayed in the application document will appear differently in the CDFI Program's web-based application portal.
9/12/2016	Dafina	Vice	Opportunity	recommendation	Intermediary lending to other CDFIs	The CDFI Program will

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	Williams	President, Public Policy	Finance Network		and lending to nonprofits are different types of lending with different risk profiles; as such there should be a distinction between these two categories. Similarly, the chart should separate single family and multifamily lending under “Residential Real Estate Lending”, as there are distinctions between making mortgage loans to individuals and lending to affordable housing developers. There should also be an “Other” category for this chart for CDFIs making loan types not captured in the existing options	take all comments into consideration.
9/12/2016	Ben Sones/Holly R. Logue	Members	FI Strategies	recommendation	We also suggest that “Consumer Financial Products” and “Consumer Financial Services” should not be combined in a single category, as consumer lending is quite different from consumer deposit accounts and other consumer financial services.	Adopted recommendation.
9/12/2016	Ben Sones/Holly R. Logue	Members	FI Strategies	concern	Applicants traditionally have provided a requested amount for the identified use of an Award in each of these five categories, and it is inconsistent and confusing to then ask Applicants to also limit their use of an Award to certain amounts within certain categories of loans and deposits	This was done to align with the statute. Guidance will include language about not being limited to categories

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9/12/2016	Ben Sones/Holly R. Logue	Members	FI Strategies	recommendation	We request that the Award Request – Eligible Uses chart be removed from the Proposed Application and replaced with a chart indicating which respective portions of the requested Award will be used for Financial Products, Loan Loss Reserves, Development Services, Financial Services, and Capital Reserves. The Narratives are the most suitable venue for describing the categories of financing activity towards which the Award is intended to be deployed.	The CDFI program will provide further clarification in application and guidance materials.
9/12/2016	Ben Sones/Holly R. Logue	Members	FI Strategies	clarification	The dropdown question “Has the CDFI been subject to any adverse legal actions during the last completed fiscal year?” needs to be clarified by inserting a materiality qualifier. Many financial institutions will experience adverse legal actions which do not merit disclosure in an FA Award Application. We therefore request that this question refer rather to “any materially adverse legal actions.”	This question was included as a proxy test of risk. Cannot be altered. However applicants can provide an explanation
9/12/2016	Ben Sones/Holly R. Logue	Members	FI Strategies	recommendation	We would also point out a minor typographical error in the question “Has the CDFI seen the departure, replacement, or change within its senior leadership team during the	no action

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					last completed fiscal year?” This should be revised to read, “Has the CDFI seen any departure . . . ?”	
9/12/2016	Ben Sones/Holly R. Logue	Members	FI Strategies	clarification	We request clarification as to whether regulated institutions are required to provide copies of their audited financial statements in connection with their FA Award Applications	The CDFI Program will not require financials for regulated institutions. However they will be required to enter the information into AMIS
9/12/2016	Ben Sones/Holly R. Logue	Members	FI Strategies	clarification	we request clarification to the effect that the Applicant should only disclose adverse audit findings actually related to that particular Applicant	The CDFI Program will provide clarification in the application and guidance materials.
8/23/2016	Tom De Simone	President & CEO	Genesis LA Economic Growth Corporation	concern	Concerned that the program might be getting too prescriptive in the use of FA funds given that question 5 asks for estimated dollar amount invested into specific uses. Concerned that this may limit their response to borrowers if they do not fit into the categories reported in the application	The CDFI Fund will provide clarification in application and guidance materials.
9/12/2016	Ben Sones/Holly R. Logue	Members	FI Strategies	recommendation	The Activity Levels Charts group various loan categories together in a manner which does not necessarily result in a useful overview of an Applicant’s portfolio. We suggest that “Commercial facilities” should not be combined with “Small	Adopted recommendation.

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					Business” and “Microenterprise,” as these are very different types of activities. Combining “Commercial Facilities” and “Community Facilities” makes more sense, as both pertain to Commercial Real Estate.	
7/14/2016	Andy Hafen	Mayor	City of Henderson	N/A	Requiring NMTC applicants to use the 2006-2010 American Community Survey (ACS) data applied to the 2010 census tracts to identify their Investment Areas and Target Market greatly hinders the ability of the City to use these tax credits to help spur investment in downtown Henderson.	Not applicable.
7/14/2016	Andy Hafen	Mayor	City of Henderson	N/A	We strongly urge the CDFI Fund to make its determination on certification of NMTC eligibility based on the most recent ACS data. While we recognize the administrative burden this may place on the agency, using the most up-to-date ACS data would help better reflect the current need and eligibility for CDFI program funds across the nation. It would also	Not applicable.



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					reflect the impacts of the recession and help meet the needs in communities still recovering from the economic downturn	
9/9/2016	Jeannine Jacokes	CEO	Community Development Bankers Association	clarification	The application is unclear as to whether question 1 is the executive summary or whether the executive summary includes question 1-4 and unclear which questions are scored	The CDFI Program will add a clarifying statement in the application.
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	The narrative characters allowed to set forth the applicant's mission statement should be increased from 500 to 1,000 characters to allow for the most comprehensive statement of the organization's mission in Question 1	The CDF Program will take all comments into consideration
9/12/2016	Dafina Williams	Vice President, Public Policy	Opportunity Finance Network	recommendation	Question 1, which asks for the applicant's Mission Statement, should have an increased character limit from the proposed 500 characters to 1,000 characters, allowing applicants space to provide the most comprehensive statement of their organization's mission	The CDFI Program will take all comments into consideration.
9/12/2016	Dafina Williams	Vice President, Public Policy	Opportunity Finance Network	recommendation	Question 10, seems more suited for the Growth and Financial Projections section of the application where respondents are asked to provide portfolio information, financial data, and report on risk management practices.	No action

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8/19/2016	Lisa Wagner	Executive Director	Bluestem Consulting	concern	character limit seems short for question 11	Character limit increase will be considered on a case by case basis
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	concern	Question 11 is repetitive and duplicative of question 9 (which is a good question). But the application will want to make sure and allow for enough characters, especially for CDFIs with several loan products and/or development services (maybe 5,000).	Addressed under question 9
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	Question 11: Asks applicants to “describe how their financial products, financial services and development services are designed to meet the applicant’s mission and the needs of the communities the applicant serves (described in the Executive Summary Section)”. We believe the linkage between the demonstrated needs in a particular community (is) for financial products and services with the particular characteristics of the planned financial products and	Character limit increase will be considered on a case by case basis

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					services, is a compelling element in scoring applicants. Therefore, we urge that 5000 characters be allowed both here, and in Question 4.	
9/12/2016	Dafina Williams	Vice President, Public Policy	Opportunity Finance Network	recommendation	Question 11 seems remarkably similar to Question 9, where applicants explain how their organization's products and services create positive outcomes in the communities they serve. OFN recommends combining those two questions into one question and eliminating either Question 9 or Question 11	Addressed under question 9
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	concern	Question 12 is vague when it says describe trends.	The CDFI Fund will provide clarification in application and guidance materials.
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	we suggest the character counts be increased to 3250	Character limit increase will be considered on a case by case basis.
9/12/2016	Dafina Williams	Vice President, Public Policy	Opportunity Finance Network	recommendation	Question 12, increase character count from the proposed 2,000 to 4,000	Character limit increase will be considered on a case by case basis.
8/19/2016	Lisa Wagner	Executive Director	Bluestem Consulting	concern	concerned that there may be overlap and redundancy for question 13 if the applicant needs to answer each subsection	The CDFI Fund will provide clarification in application and guidance materials.
9/9/2016	Chrystel		First Nations	concern	If an applicant has to answer each	The CDFI Fund will

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	Cornelius/ Tanya Fiddler		Oweesta Corporation/ Native CDFI Network		subsection separately there may be a lot of overlap and redundancy.	provide clarification in application and guidance materials.
9/12/2016	Dafina Williams	Vice President, Public Policy	Opportunity Finance Network	recommendation	Some proposed changes generated comments from our Members, particularly Board Member accountability to the applicant's target market. CDFIs questioned why applicants needed to include Board Member accountability in the application if their organizations are now recertified annually and must report on Board accountability during that process. They recommended the narrative focus more on management and relevant experience rather than accountability.	Will not be removed
9/12/2016	Ben Sones/Holly R. Logue	Members	FI Strategies	recommendation	Q. 13- We request that clarification be provided as to which kinds of data sources the CDFI Fund finds acceptable for use by Applicants in quantifying actual market share. We request that clarification also be provided as to which kinds of data sources the CDFI Fund finds acceptable for use by Applicants in quantifying demand.	The CDFI Fund will provide clarification in application and guidance materials.
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	Question 14: The Coalition commends the Fund for replacing	No action

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					the obligation to provide copies of policies and procedures with this question and the drop down questions	
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	clarification	With questions 15, does the Fund want applicants to compare their current financial position with their financial position in past years?	The CDFI Fund will provide clarification in application and guidance materials.
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	recommendation	Maybe move questions 15, 16, and 17 in between questions 20 and 21.	No action
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	Question 15: Should have a higher character limit to explain unusual circumstances.	Character limit increase will be considered on a case by case basis.
9/12/2016	Dafina Williams	Vice President, Public Policy	Opportunity Finance Network	recommendation	Q. 15 needs a higher character limit and additional guidance.	Character limit increase will be considered on a case by case basis.
8/19/2016	Lisa Wagner	Executive Director	Bluestem Consulting	clarification	Thinks question 16 is confusing. Seems similar to question 15	The CDFI Fund will provide clarification in application and guidance materials.
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	clarification	For question 16, this question is a little confusing. Is this question just asking for discrepancies between the FA app and audited statements? It seems like it is asking the applicant to again discuss their financial health	The CDFI Fund will provide clarification in application and guidance materials.

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					just as in Q15, as well as to address any discrepancies between the application and audits.	
8/19/2016	Lisa Wagner	Executive Director	Bluestem Consulting	recommendation	for question 17, if the applicant is going to be penalized for 3 years of audit findings, then they should be allowed to address findings in any/all of those years	Applicant will be allowed to address all three years
9/9/2016	Jeannine Jacokes	CEO	Community Development Bankers Association	recommendation	questions 17 &18 should define what PG&M means	Will be defined in glossary
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	clarification	For question 17, if an applicant will be docked points only for audit findings in the last fiscal year, then this question is fine. If an applicant will also be docked points for audit findings in the last three years, then we think applicants should be allowed to address findings in the last three years (and not just the last year).	Timeline will be clarified in guidance
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	Question 17: Should have a “not applicable” option	Option will be added in AMIS
9/12/2016	Dafina Williams	Vice President, Public Policy	Opportunity Finance Network	recommendation	Q. 17 should include a small narrative section for applicants who cannot provide audited statements within 180 days of fiscal year end.	If audits cannot be provided then applicant can use NA from the drop down
9/12/2016	Ben Sones/Holly R. Logue	Members	FI Strategies	clarification	We request clarification as to whether regulated Applicants are required to nevertheless answer	Regulated entities will answer this question

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					Question 17 regarding audit findings.	
9/9/2016	Jeannine Jacokes	CEO	Community Development Bankers Association	recommendation	q19. formally defaulted should be defined	The CDFI Fund will provide clarification in application and guidance materials.
9/12/2016	James R. Klein	Chair	CDFI Coalition	clarification	Question 19: The CDFI Fund should clarify what it means by “formally defaulted”. Does this mean a default that has been recognized as such by the lender rather than an informal arrangement under which a funder waives or in some way chooses not to recognize a default? The CDFI Fund should also clarify if this applies to non-financial defaults	The CDFI Fund will provide clarification in application and guidance materials.
9/12/2016	Dafina Williams	Vice President, Public Policy	Opportunity Finance Network	recommendation	Q. 19 needs additional guidance. The Fund should clarify how they are defining default, and whether defaulting on a prior debt includes negotiating a note buy-down or writing off debt	The CDFI Fund will provide clarification in application and guidance materials.
9/10/2016	Katherine Forth		Cinnaire Lending	recommendation	Question 2, commercial facilities should be separated from small business and microenterprise	Adopted recommendation.
9/12/2016	Dafina Williams	Vice President, Public Policy	Opportunity Finance Network	recommendation	Question 2 should be modified to reflect the financial products and services offered by CDFIs	Adopted recommendation.
9/9/2016	Jeannine Jacokes	CEO	Community Development	recommendation	q20c should ask what caused the performance problems, what has	The CDFI Fund will provide clarification in

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			Bankers Association		been done to mitigate the issues, the current status and projected timeframe for improvement	application and guidance materials.
9/12/2016	Dafina Williams	Vice President, Public Policy	Opportunity Finance Network	recommendation	Question 20, which will calculate where an applicant falls on a scale from 1 to 5 for Minimum and Prudent Standard Ratios (MAPS), also needs additional guidance to explain any changes in MAPS ratios or their calculations	The CDFI Fund will provide clarification in application and guidance materials.
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	Question 20c: The question would produce a more meaningful answer if it clearly asked, in addition to what caused the performance, to explain where the applicant stands today and what steps it has taken to improve the MAPS or its projected timeframe for improvement. In addition, to supply a comprehensive picture, we urge that applicants be asked to explain the scores on all the MAPS ratios	The CDFI Fund will provide clarification in application and guidance materials.
8/19/2016	Lisa Wagner	Executive Director	Bluestem Consulting	clarification	do not see a difference between questions 21,6 and 7	The CDFI Fund will provide clarification in application and guidance materials.
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	clarification	We don't see how question 21 is different from questions 6 and 7 – it seems the answers will be the same. The “Describe the extent to which the requested award (as listed in	The CDFI Program will take all comments into consideration.



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					question 5) will build, increase, augment, or improve your organization’s ability to achieve the identified strategic goals and FA Objectives” part of question 21 seems repetitive from question 7 (which was 5,000 characters). And the “Previous FA award recipients should include a quantifiable discussion about how another or new award will additionally increase or augment the organization’s ability to achieve the identified strategic goals or how strategic goals have changed or evolved” part of question 21 seems repetitive too. Also did the Fund want them to talk about identified strategic goals or financial projections here?	
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	Question 21: Substantially similar to Question 7; perhaps the question should be re-crafted to tie to the financial goals behind the strategic goals	The CDFI Program will take all comments into consideration.
9/12/2016	Dafina Williams	Vice President, Public Policy	Opportunity Finance Network	recommendation	Q. 21, is very similar to the information requested in Questions 7 and 8. OFN recommends moving this question to the Business Strategy section, or eliminating the question and modifying Questions 7 and 8 and increasing the character	The CDFI Program will take all comments into consideration.

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					counts	
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	Question 22: Should include “increased volume” at the end of the first sentence to be consistent with the rest of the application.	No action
9/12/2016	Ben Sones/Holly R. Logue	Members	FI Strategies	recommendation	Q. 22, typo- the word "a" should be deleted in "a larger service areas"	Corrected in application
8/19/2016	Lisa Wagner	Executive Director	Bluestem Consulting	concern	2,000 character limit for question 23 seems inadequate	Character limit increase will be considered on a case by case basis.
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	recommendation	For question 23, the corresponding table needs to define affordable housing. And a 2,000 character limit here seems extremely inadequate to address both financial and lending activity projections and to tie those in with strategic goals.	The CDFI fund will provide definitions in application and guidance materials.
9/12/2016	Ben Sones/Holly R. Logue	Members	FI Strategies	clarification	Q. 23- we request clarification as to the intent of this question	The CDFI Fund will provide clarification in application and guidance materials.
8/19/2016	Lisa Wagner	Executive Director	Bluestem Consulting	clarification	question 25 seems the same as question 10	The CDFI Program eliminated Question 25 and combined with Question 10
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	concern	Question 25 seems repetitive to question 10 and when asking about growth goals, does the Fund mean to ask about strategic goals here? If the Fund wants to look at strategic goals	The CDFI Program eliminated Question 25 and combined with Question 10

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					and financial projections separately, make that clear and have applicants not talk about financial pieces in the strategic goals section then.	
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	Question 25: Should be clarified to indicate if it refers to financial goals, strategic goals or both	The CDFI Fund will provide clarification in application and guidance materials.
9/12/2016	Dafina Williams	Vice President, Public Policy	Opportunity Finance Network	recommendation	Question 25 should clarify if the question explicitly refers to risks associated with financial growth; otherwise it asks for the same information provided in Question 10 and should be deleted	The CDFI Fund reworded the question so the intent is clear and is differentiated from each other and will provide further clarification as necessary in the guidance materials.
8/19/2016	Lisa Wagner	Executive Director	Bluestem Consulting	concern	character limit seems too short for question 26	Character limit increase will be considered on a case by case basis.
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	concern	Question 26a seems like too short a character limit to adequately describe leveraging partnerships	Character limit increase will be considered on a case by case basis.
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	Question 26a: We suggest that applicants identify sources and amounts of third party funds over the last 3 years and their plan for raising funds from the same or new sources in the next 3 years	The CDFI Fund will provide clarification in application and guidance materials.
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	Question 26b: Should ask the applicant to describe their strategy	The CDFI Fund reworded the question so the intent is

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					for community coordination and in addition ask whether the FA award is intended to improve that coordination	clear and is differentiated from each other and will provide further clarification as necessary in the guidance materials.
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network		For question 27, this question seems problematic for either applicants answering they will be fine if they do not receive an award or if they will be in serious trouble if they do not receive an award. Will this answer (either way) be used to screen applicants? That is what people are worried about with this question/answer.	The CDFI Fund eliminated this question.
9/12/2016	Dafina Williams	Vice President, Public Policy	Opportunity Finance Network	concern	Question 27, was confusing for some OFN Members, who questioned how the Fund intends to use this information in award decisions. OFN has also noted a shift in the proposed application that seems to discourage CDFIs from relying too heavily on an FA award for continued growth and fiscal solvency.	The CDFI Fund eliminated this question.
9/10/2016	Katherine Forth		Cinnaire Lending	recommendation	additional information on the notation in question 3; the statutory requirements referenced should be clearly delineated for applicants	The CDFI Fund will provide clarification in application and guidance materials.
9/10/2016	Katherine Forth		Cinnaire Lending	recommendation	separating clients and beneficiaries' data in question 3's target market	The CDFI Program will separate "clients" and

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					charts	"beneficiaries" and provide further clarification in the application and guidance materials.
9/9/2016	Jeannine Jacokes	CEO	Community Development Bankers Association	concern	Urges not to collect demographic information which they are prohibited from collecting. Sees this as unfair and should not be included in the scoring process. Acknowledges the use of proxy data but states that we have not defined what that is	This has to be done per the statute. The CDFI Program will provide additional guidance for regulated entities in the application and guidance materials.
9/9/2016	Jeannine Jacokes	CEO	Community Development Bankers Association	recommendation	question 3 and 6 should be omitted	This has to be done per the statute. The CDFI Program will provide additional guidance for regulated entities in the application and guidance materials.
9/9/2016	Jeannine Jacokes	CEO	Community Development Bankers Association	recommendation	there should be a narrative response to accompany question 3	Adopted recommendation.
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	CHART: Gender and Other Characteristics for Most Recently Completed Fiscal Year <ul style="list-style-type: none"> <li>This chart should be expanded so that both clients (borrowers) who are female heads of households or have other characteristics, as well as beneficiaries are captured. For example, women-owned businesses</li> </ul>	The CDFI Program will separate "female headed households" and "female headed businesses" and provide further clarification in the application and guidance materials.

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					should be separately captured, and are not the same as female-headed households. This would enable the CDFI Fund to gauge, for example, the number of female headed micro loans are being made, or female – owned development firms are obtaining real estate loans	
9/12/2016	Dafina Williams	Vice President, Public Policy	Opportunity Finance Network	recommendation	Question 3, which asks applicants to provide demographic data on their clients, should list the number of clients separately from the number of beneficiaries where relevant, most likely in the case of affordable housing, community facilities and business loans. OFN agrees with the CDFI Coalition that the Fund should define what constitutes a beneficiary. Some CDFIs stated their lending is primarily business to business, and often demographic information of the end beneficiaries is not collected and is unknown. This section should also include a “N/A” option as well as a small narrative section for applicants to explain anything that is not clear from their submissions in AMIS	The Fund will provide clear definitions for clients and beneficiaries
9/9/2016	Chrystel Cornelius/ Tanya		First Nations Oweesta Corporation/	recommendation	For the number 4 quantitative data requirements, target market specifics, applicants have Tribal	The CDFI fund will provide clarification in guidance materials to

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	Fiddler		Native CDFI Network		citizens that are not in poverty, however, they do not make as much money as the cost of living requires. Would like to see how applicants can increase ability to justify needs by showing the difference between income and cost of living.	define income levels
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	Question 4 should have a 5,000 character limit given its importance in setting the foundation for the need for the applicant's financial products or services.	The CDFI Fund thinks the character count for this question is sufficient and will not increase.
9/12/2016	Dafina Williams	Vice President, Public Policy	Opportunity Finance Network	concern	Question 4, which asks applicants to provide data on their target markets, could result in potentially burdensome information collection for CDFIs serving multiple target markets. Members also questioned whether AMIS was configured to allow CDFIs to input demographic information from multiple target markets	The CDFI Program will take all comments into consideration.
8/19/2016	Lisa Wagner	Executive Director	Bluestem Consulting	concern	Concerned about question 5 of the application that asks applicants to provide the amounts they are requesting for all eligible uses. Thinks estimates can be made but demand and deployment would be difficult to predict	The CDFI Program will update this chart to make it clearer.
8/19/2016	Lisa Wagner	Executive Director	Bluestem Consulting	clarification	Question 5. If an applicant wants to use part of an FA award for LLR and	The CDFI Program will update this chart to make it

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					another for development services that serve multiple or all of their loan products, how should they break that out on the chart?	clearer.
9/9/2016	Jeannine Jacokes	CEO	Community Development Bankers Association	recommendation	The projected FA award uses chart presents real challenges in predicting the exact dollar amount of demand by loan category. A narrative response is recommended as an alternative	The CDFI Program will update this chart to make it clearer.
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	clarification	Question 5 doesn't match the corresponding table. What is the Fund looking for with the question and corresponding table? Will the Fund hold awardees to this? It's possible to make estimates, but actual demand and deployment may differ. What if an applicant plans to use part of an FA award for Development Services such as credit counseling and they offer several loan products - how should they break that out on the chart?	The CDFI Program will update this chart to make it clearer.
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	Question 5: As noted in connection with the comments offered regarding the chart, the Fund should give concise instructions on how an applicant is to develop the responses to the Target Market Statistics chart that relates to eligible uses for FA, for example loan loss reserves. The	The CDFI Program will update this chart to make it clearer.



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					corresponding chart should include those FA uses	
9/12/2016	Dafina Williams	Vice President, Public Policy	Opportunity Finance Network	concern	Question 5, This request appears to restrict the use of FA dollars into the specific asset classes identified at the time of application, limiting the ability of organizations to deploy capital as it is needed and where it is needed most. In prior years, the Fund has not narrowly aligned funding amounts with specific asset classes, provided the proposed uses were within the CDFI's mission as approved through the certification process.	The CDFI Program will update this chart to make it clearer.
8/19/2016	Lisa Wagner	Executive Director	Bluestem Consulting	concern	Concerned that the increasing volume of current products and services could include expanding into a new area or serving a new population. Thinks it makes 6a-b redundant and confusing to answer	The CDFI Program will provide definitions in the application and guidance materials.
8/19/2016	Lisa Wagner	Executive Director	Bluestem Consulting	clarification	6a.if a CDFI is expanding into new counties, but not necessarily new states what would be reflected? Are applicants supposed to guess what level they will deploy in the new state?	Application allows applicant to select expansion into a new county. Will also clarify in guidance
8/19/2016	Lisa Wagner	Executive Director	Bluestem Consulting	recommendation	feels that the charts from 6a-c should be eliminated and narrative should be used instead and then use 6d to show increased activity levels	The CDFI Program believes that these charts are the best way to convey the requested information.

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9/9/2016	Jeannine Jacokes	CEO	Community Development Bankers Association	recommendation	question 6: client and beneficiary should be defined	The CDFI Program will separate "clients" and "beneficiaries" and provide further clarification in the application and guidance materials.
9/9/2016	Jeannine Jacokes	CEO	Community Development Bankers Association	recommendation	q6. With regards to new development services to be offered, the options presented are too narrowly defined. Another category should be offered with a narrative to describe services	Adopted recommendation.
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	clarification	For question 6, the objective of Increase volume of current products and services often includes expanding into a new area or serving a new population. This will make 6a-6d redundant and/or very confusing for the applicant to answer.	The CDFI Program will provide further clarification in the application and guidance materials.
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	clarification	For question 6a, it seems very similar to TM description/need question (same for 6b & 6c). Could be repetitive, especially with such a large character count. Or, be clear in previous TM question. For table in question 6a, expansion may not be to another state but into new counties, so the Fund might not see anything reflected here. In the chart, are applicants supposed to guess at what	The CDFI Program will provide further clarification in the application and guidance materials and made updates to the chart to address these concerns.

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					level they will deploy in the new state? Applicants can certainly estimate, but we're not sure how that information helps anyone.	
9/12/2016	Dafina Williams	Vice President, Public Policy	Opportunity Finance Network	recommendation	Question 6, could use additional guidance and clarity. Question 6c's chart on page 9 should clarify if applicants are to enter the dollar amount of their portfolio currently outstanding in each line of business, or project future financing activity. If it is the former, it is unclear how a CDFI requesting funds to develop a new product or service should answer this question if they do not currently have any financing activity to report in that sector. If it is the latter, and the Question relates to projected activity, that information is collected Growth and Projections section of the application and should be deleted from this section	The CDFI Program will provide further clarification in the application and guidance materials and made updates to the chart to address these concerns.
9/12/2016	Ben Sones/Holly R. Logue	Members	FI Strategies	concern	The chart in 6a asks for information about new Investment Areas an Applicant will beserving; however, the chart does not account for intrastate expansion. As community banks, most of our CDFI bank clients are seeking to expand into new underserved markets within the same states in which they are already	The CDFI Program will provide further clarification in the application and guidance materials and made updates to the chart to address these concerns.

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					doing business. The chart in 6a does not have a means by which to identify such an expansion; rather, it is merely a listing of the 50 states and would only reflect an interstate expansion. This does not appear to be a useful chart for most purposes, and it is not clear how the information provided therein would affect the evaluation of an Applicant's FA Award Application.	
8/19/2016	Lisa Wagner	Executive Director	Bluestem Consulting	clarification	6b. confused about the demographic data that should be entered for future borrowers e.g. female/new races, income etc.	The CDFI program will provide further clarification in application and guidance materials.
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	clarification	For the table with question 6b – same comments as before. The first table is confusing. And what does other mean? Are applicants supposed to guess or estimate the number of new females/new races/income of future borrowers? These seems like it would be very difficult and only that – a guess or estimate. This seems like it would take a fair amount of time and not provide meaningful information. For the second table, if applicable table, clarify OTP and notes on why their numbers may not equal 100%. Also, correct Native Alaskan to Alaska	The CDFI Fund will provide clarification in application and guidance materials.

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					Native and Native America to Native American. For the third table, should include text or link to how the Fund wants these figures measured – what metrics is the Fund using? What would other be, high? If so, just say that. If the application leaves it as other, move it to the bottom of the list. Should this add to 100%? Clarify for applicants.	
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	clarification	For question 6c, similar comments as 6a and 6b. Also, first table, if it's a new product and they haven't started lending, do they just enter zero? Some help text would be good. And define business and microfinance. For the second table, can the application add "& Training" to the first bullet; "& Coaching" to the second bullet; "Technical Assistance & Training" to the third bullet; and "& Training" to the fourth bullet.	The CDFI Fund will provide clarification in application and guidance materials.
9/12/2016	Ben Sones/Holly R. Logue	Members	FI Strategies	concern	The chart in 6c is confusing, and we request that it be deleted. The Narratives provide the best medium for communicating the projected nature and extent of new products and services.	The CDFI Fund will provide clarification in application and guidance materials.
9/9/2016	Chrystel Cornelius/		First Nations Oweesta	recommendation	For the table with question 6d, define affordable housing. Also, this	The CDFI fund will provide definitions in

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	Tanya Fiddler		Corporation/ Native CDFI Network		seems reasonable. Seems like the charts on 6a-6c should be eliminated - and just have applicants provide narrative and then use 6d to show increased activity levels.	application and guidance materials.
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	recommendation	For question 7, maybe make this the first question?	No action
9/12/2016	Dafina Williams	Vice President, Public Policy	Opportunity Finance Network		Question 7, which asks applicants to connect their FA objectives with their organization's institutional goals is a critical piece of strategic information for award decision-making. CDFIs expressed appreciation for the increased character count in this section of the application from previous applications	No action
8/19/2016	Lisa Wagner	Executive Director	Bluestem Consulting	clarification	Confused as to what is the difference between question 8 and question 5. what information should be used in 8 and for how far back e.g. 3 years, 5 years	The CDFI Program will provide further clarification in the application and guidance materials.
9/10/2016	Katherine Forth		Cinnaire Lending	recommendation	question 8 should be clarified and time-limited	The CDFI Program will provide further clarification in the application and guidance materials.
9/9/2016	Chrystel		First Nations	clarification	The way question 8 is phrased may	The CDFI Program will

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	Cornelius/ Tanya Fiddler		Oweesta Corporation/ Native CDFI Network		force a lot of new things in terms of an answer. And for the corresponding table of previous CDFI Fund FA award uses, be specific – these categories weren’t used in previous years. Also, does commercial products and services include consumer lending (if so, that’s fine, if not, it’s missing); define affordable housing, and define microenterprise and small business. For next table, projected CDFI Fund FA Award uses, clarify this more. And same comments for commercial products and services, affordable housing, and small business and microenterprise. This question is also confusing because if a CDFI had strong growth and is successfully deploying all previous awards, and continues to experience strong demand or is continuing to expand and grow as described in previous awards, is this considered different? In the Previous CDFI Fund FA Award Uses, should an applicant consolidate all awards for the last 3 years? The last 5 years? We are not sure what the Fund is looking for here. The Projected CDFI Fund FA Award Uses will	provide further clarification in the application and guidance materials.

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					have already been provided under question 5, so is the Fund looking for something different in the chart under question 8?	
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	Question 8: Should be amended to discuss how a new award request differs from past requests, and if it does not differ, why? This question should be limited to the past 3 requests for which awards were received, or any requests that resulted in awards made within the last 5 years	The CDFI Program will provide further clarification in the application and guidance materials.
9/12/2016	Dafina Williams	Vice President, Public Policy	Opportunity Finance Network	concern	Question 8, CDFIs requested additional guidance on whether organizations building on a successful existing strategy, rather than proposing an entirely new strategy, will be penalized in the award phase. CDFIs often use their FA awards to continue their existing successful programs and strategies; a shift in the Fund's priorities for awards in this area could result in extremely impactful strategies going unfunded while newer but unproven ideas receive more attention. The Fund should clarify if applicants are expected to present a new strategy for an application each year, and if failure to do so will negatively	The CDFI Program will provide further clarification in the application and guidance materials.



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					impact award prospects	
9/12/2016	Dafina Williams	Vice President, Public Policy	Opportunity Finance Network	clarification	Question 8 lacked clarity and needs additional guidance	The CDFI Program will provide further clarification in the application and guidance materials.
9/12/2016	Ben Sones/Holly R. Logue	Members	FI Strategies	concern	Q. 8- It is unreasonable and burdensome to ask prior Awardees to provide a breakdown by product line where such recordkeeping has not been required by the Fund and does not exist.	No action
9/9/2016	Jeannine Jacokes	CEO	Community Development Bankers Association	clarification	more clarity is needed on q9 because positive outcomes could be interpreted many ways	The CDFI Program will provide further clarification in the application and guidance materials.
9/9/2016	Jeannine Jacokes	CEO	Community Development Bankers Association		clarity is needed to distinguish the differences between information sought in questions 9 and 11	The CDFI Program will take all comments into consideration.
9/12/2016	James R. Klein	Chair	CDFI Coalition	recommendation	Question 9: Should be slightly reworded as follows: “how your organization’s financial products and services are intended to create short term and long term positive	The CDFI Program will provide further clarification in the application and guidance materials.

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					outcomes....” In anticipation of deploying the applicant’s financial products and services the applicant can only discuss the outcomes they expect to create. In addition, please clarify if citations to studies, data sources or reports supporting various outcomes are to be included, whether readers will be allowed to review them, and whether the CDFI Fund will allow those citations to be included in footnotes and not count against the character count. If the Fund wants “evidence-based” data, it needs to allow applicants the space to reference the documentation that supports the data, and readers should be able to evaluate it.	
9/12/2016	Dafina Williams	Vice President, Public Policy	Opportunity Finance Network	clarification	Question 9, the Fund could provide additional clarity around some of the language in this section, particularly the definition of “evidence-based”.	The CDFI Program will provide further clarification in the application and guidance materials.
9/9/2016	Jeannine Jacokes	CEO	Community Development Bankers Association	recommendation	recommends the use of data and definitions from the call reports and/or NCUA 5300 for regulated CDFIs	The CDFI Program will take all comments into consideration.
9/9/2016	Jeannine Jacokes	CEO	Community Development Bankers Association	concern	Concerned that the application does not specifically state that FA can be used for equity capital or reserves e.g. non-voting stock. Noted that	The CDFI Program will take all comments into consideration.

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					CDFI banks pay taxes on grants, funds that could instead go back into communities	
9/9/2016	Jeannine Jacokes	CEO	Community Development Bankers Association	recommendation	do not aggregate CRE loans in the activities level charts; do not aggregate consumer financial products & services as services and loans are distinctly different	Adopted recommendation.
9/12/2016	Terry Ratigan	Senior CDFI Specialist	National Federation of Community Development Credit Unions	recommendation	The financial information required in the application does not conform to the definitions and rigorous standards established over decades by federal regulatory agencies for banks and credit unions. In contravention of the Paperwork Reduction Act, regulated CDFIs that already produce detailed financial statements on a quarterly basis for one federal agency are required to reclassify and resubmit this same data for another. This burden on regulated CDFIs is tripled by the inconsistent account structure and definitions used by the CDFI Fund for three types of financial reports: (I) FA/TA applications; (ii) CDFI Annual Data Collection and Recertification Reports; and, (iii) CIIS Institution Level Reports. Last year the CDFI Fund issued a “crosswalk” to help regulated CDFIs	The CDFI Program will provide additional guidance for regulated entities in the application and guidance materials.

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					<p>present their financial data according to the CDFI Fund’s FA application format. The crosswalk itself contained numerous errors that we expect to be corrected in the future, but we maintain that the entire exercise is misguided; regulated CDFIs simply should not be required to reclassify their financial data. That process adds significant costs for regulated CDFIs with no discernable benefits, since the CDFI Fund can and should assess the financial health, viability, performance and trends for all regulated CDFIs using the detailed financial data that is already publicly available and represents the global standard for comparative analysis of financial institutions. Indeed, we believe that the CDFI Fund should encourage unregulated CDFIs to move towards the more rigorous and consistent reporting standards of banks and credit unions, not the other way around. We urge the Fund to retain the services of an expert in financial statements and reporting for regulated institutions to ensure consistent conformity with regulatory standards and definitions.</p>	

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9/12/2016	Terry Ratigan	Senior CDFI Specialist	National Federation of Community Development Credit Unions	concern	The narrative questions are sufficiently clear, but the charts in their current form would need extensive clarifications and instructions for regulated CDFIs	The CDFI Program will provide additional guidance for regulated entities in the application and guidance materials.
9/12/2016	Ben Sones/Holly R. Logue	Members	FI Strategies	concern	If Applicants are asked to break down their portfolios and activities by lines of business for multiple purposes throughout the Application, there should be consistency as to the categories requested. Most CDFI Banks' systems do not track financing activities according to the precise categories requested in a particular CDFI application; therefore, the process of reviewing the Bank's loan reports and existing coding to determine an appropriate category breakdown for application purposes is usually a time-intensive and difficult process.	The CDFI Program will provide additional guidance for regulated entities in the application and guidance materials.
9/12/2016	Ben Sones/Holly R. Logue	Members	FI Strategies	recommendation	There are several locations throughout the Application that call for demographic data that regulated institutions are prohibited from collecting. Rather than using proxy data, we recommend regulated institutions be exempt from these sections.	The CDFI Program will provide additional guidance for regulated entities in the application and guidance materials.
9/12/2016	Ben Sones/Holly	Members	FI Strategies	clarification	We ask for more clarity and guidance on acceptable proxy data.	The CDFI Fund will provide clarification in

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	R. Logue				Because regulated institutions are prohibited from tracking such information on their individual customers, we request that regulated institutions be permitted to use the demographics of their Target Markets as a proxy for their customer base demographics	application and guidance materials.
9/12/2016	Ben Sones/Holly R. Logue	Members	FI Strategies	clarification	The dropdown questions regarding formal, written policies and procedures for complying with financial assistance agreement requirements seem to imply that the Fund expects CDFIs to adopt separate written policies and procedures explicitly for this purpose. Many regulated Awardees rely on their existing policies, procedures, and internal controls to ensure compliance with financial assistance agreement requirements. We request clarification regarding the CDFI Fund's expectations in this area and how the existence or nonexistence of separate written policies and procedures devoted specifically to this matter might impact the evaluation and scoring of an Applicant's FA Award Application	The CDFI Fund will provide clarification in application and guidance materials.
9/12/2016	Ben	Members	FI Strategies	clarification	Regulated applicants will require	The CDFI Fund will

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	Sones/Holly R. Logue				further clarification on Financing Capital Available/ Financing Capital Detail/Total Financing Capital and Cash Restricted for Operations	provide clarification in application and guidance materials.
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	clarification	For Loans/Financing/Loan Guarantees/Financial Services Currently Offered table, define business loans and microfinance loans.	The CDFI Fund will provide clarification in application and guidance materials.
9/12/2016	James R. Klein	Chair	CDFI Coalition	unclear	No new charts; see comments on referenced charts in preceding sections	The CDFI Program does not understand the intent of this comment.

**Technical Assistance Application**

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9/9./2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	concern	<b>TA-</b> application is still difficult for organizations not yet in operation, all questions assume a fully functioning CDFI in the way they are phrased. Appears more questions are added for the least experienced groups	The CDFI Program intends to provide guidance and to look at the application questions as written, from a non-operational CDFI perspective. We will include education on what the Fund does in our outreach in order to outline how TA funds are to be used.

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9/9./2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	concern	Section 1 reads like the Fund is assuming an inside knowledge of the Fund that emerging/certifiable CDFIs and sponsoring entities won't have. Only groups with consultants will get this section. It will limit community based groups	It is our intention to provide more information on the intent of TA as part of our outreach
9/9./2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	recommendation	When discussing character limits specify that it includes spaces and should comply with Microsoft word. AMIS needs to be corrected for character count to match this	AMIS cannot align with Microsoft software. The Fund will be clear about this in the application.
9/9./2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	clarification	in section 1 statement of certification qualifications, the application needs to clarify the time limit rules-provide all information and not just some information	The CDFI Program will clarify timelines for certification in the application, outreach and NOFA.
9/9./2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	recommendation	In question 2, the wording needs to be more specific. In the first bullet add "or plans to", in the second bullet "lending track record" is too vague and maybe add wording to include their lending plans	The CDFI Program will clarify the guidance for question 2, but will not change the question. The guidance will clarify what "lending track record" means and specify how organizations with or without prior lending



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						activity should respond. Groups with no track record will need to provide plans for accomplishing goals by their required certification date, example of potential activities and reasoning behind thoughts.
9/9./2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	clarification	In section 1 is there a way of comparing the qualifications of groups who haven't started yet?	The CDFI Program will be clear in the guidance about the intent and the review process, which will prioritize entities that will be successful in obtaining certification by the set date.
9/9./2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	recommendation	for question 3 please add "TM include (or will include) the following	The CDFI Program will this in the application materials and guidance
9/9./2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	recommendation	For question 3 when asking about IA/LITP/OTP, the application should clarify with help text so applicants fully understand the metrics the Fund is using or referring to	The CDFI Program will (work with CCME to) ensure applicants are provided the definitions in guidance materials.
9/9./2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	concern	for question 3 where it says "provide brief description of the entire TM add language or how you will determine it	The CDFI Program will (work with CCME to) ensure applicants definitions are provided in the guidance materials.

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9/9./2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	concern	For question 3, NACA is a funding opportunity and not a certification application. The question phrased the way it is, the Fund might get very similar answers from applications that certification will provide access to additional funding opportunities and confer legitimacy.	The Fund will provide education and clarity around the purpose.
9/9./2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	clarification	For question 4, be more specific.	The CDFI Program will work (with CCME) on how accountability is to be measured and incorporate guidance from certification to ensure one set of criteria is being used throughout the Fund. Check with CCME regarding guidance materials
9/9./2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	recommendation	For question 6, needs to be two separate questions, especially given 1,000 character count. Question 1) “Explain how the Applicant works or will work with other organizations to provide comprehensive services to its target market”; 2) “How does the Applicant plan to use private and public financial support to meet its strategic goals.” Clarify on second question that public support includes or doesn’t include these funds from	This will be made two questions under community coordination. CDFI funds will be excluded from public funding.

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Date of Comment	Author Name	Author Position	Organization	Category	Comment	CDFI/ NACA Program Office Response
					the Fund.	
9/9./2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	recommendation	For question 7, the character count should be longer at 2,500/3,000 and provide an example of metrics. The Fund should make a stronger connection between performance and financial health if that what the Fund wants to see. Otherwise, we see applicants telling the Fund about their financial management policies here. Is this section where the Fund wants applicants to address financial health in terms of the MPS ratios? If so, clarify.	The question will be changed to discuss the applicant's financial health for sustainability (in the context of continuing operations). In order to get to the question of a going concern. Applicants with a portfolio will be asked to address it under its sustainability plan as well.
9/9./2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	concern	Question 8 may be difficult to answer for applicants who have a brand new strategic plan, especially if it's their first strategic plan. Also, it could be good to add a question around how well did the applicant do in executing their previous strategic plan.	The CDFI Program will remove the words "milestones achieved" in order provide clarity. The revised question will read "Discuss organizational progress made toward the Applicant's strategic goals"
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	recommendation	For NACA, should make that language more tailored for Native CDFIs. Stronger language defining what an eligible NACA applicant is – because there are non-Native orgs tapping into NACA because it is easier to compete. There should be severe clarity on what a NACA	The CDFI Program believes the criteria (eligibility requirements and NOFA) are very specific and have no evidence that non-NACA applicants are applying or receiving awards.

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					eligible entity is and what the NACA program – why it was created (after the lending study, etc.)	
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	recommendation	Be clearer how certifiable section ties into rest of NACA TA application	The CDFI Program's intention is to provide more information on the intent of TA as part of our outreach
9/9./2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	recommendation	The 2,000 character limit is better for TA application, first question	We do not agree and will leave the character limit at 3,000
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	recommendation	For the NACA application, there should be questions/items related to how and why Native CDFIs can be effective in Indian Country. Part of organizational impact and performance should be additional questions on how and why this applicant can serve trust lands and unique communities. Should have groups explain why they are applying under NACA and what it is about their application that makes them effective in reaching Native clientele. The application is vanilla and it doesn't really lift up what really makes NACA a special and awesome program. And organizations should explain and	The application allows CDFIs and sponsoring entities to highlight who they are. The guidance can be used guide NACA applicants to telling their specific story. Include information on evaluation in the NOFA for NACA applicants. May focus on impact in Indian Country. Will consider evaluation under step 4 of our process.

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					narrate why it is they would be good Native CDFIs to get down to what Native families and businesses really need	
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	clarification	Are these new data points to be answered with a dollar amount with no explanation? Needs more clarity.	we need more clarity
9/9/2016	Chrystel Cornelius/ Tanya Fiddler		First Nations Oweesta Corporation/ Native CDFI Network	clarification	If an applicant's proposed CDFI is new and sponsored by the Tribe, do they enter the Tribe's financial data? Need more clarification	The CDFI Program will clarify this in the application and guidance materials.
9/12/2016	Dafina Williams	Vice President, Public Policy	Opportunity Finance Network	concern	lacks any distinguishing characteristics to differentiate the NACA Program from the FA and TA programs nor does it take into account what makes the NACA Program valuable and important.	The Fund believes its strict protocol regarding who can apply which is sufficient to ensure differentiation between the others. Policy issue we need discuss at the Fund. Will add on to the questions for TA and an incorporation of NACA specific criteria for step 4
9/12/2016	Dafina Williams	Vice President, Public Policy	Opportunity Finance Network	recommendation	Since the application is much shorter than previous years, the Fund should consider increasing character counts throughout the Technical Assistance application.	The CDFI Program will consider a character increase for questions on a case by case basis.
9/12/2016	Dafina Williams	Vice President,	Opportunity Finance	recommendation	CDFIs indicated Emerging CDFIs and Sponsoring Entities may not be	AMIS does not allow N/A into fields, applicants will

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		Public Policy	Network		<p>able to provide the same level of financial detail as FA applicants. The application should include an “N/A” option in the financial data questions, and the Fund should allow CDFIs to explain any missing or incomplete information. The application should also include a space for a narrative alongside any new data requests, and the Fund should clarify how these new data points will be used in the application process.</p>	<p>be asked to leave fields blank. The Fund will provide clarity in guidance.</p>