

Community Development Financial Institutions Fund, Department of the Treasury

Supporting Statement for Paperwork Reduction Act Submissions  
Community Development Financial Institutions Fund (CDFI Fund)  
Bank Enterprise Program (BEA Program)

Community Development Financial Institutions Program (CDFI Program)  
Native American CDFI Assistance Program (NACA Program)

Uses of Award Report Form (formerly BEA Program Award Report Form), 1559-0032

**A. Justification**

1. Circumstances necessitating collection of information

The CDFI Fund administers the BEA Program, CDFI Program, and NACA Program. In an effort to create uniformity in reporting across the CDFI Fund, the CDFI Fund revised the BEA Program Award Report Form so it may be used by the BEA Program as well as the CDFI Program and NACA Program. The revised form has been renamed the “Uses of Award Report Form.”

The BEA Program provides incentives to insured depository institutions to increase their support of CDFIs and their activities in economically distressed communities. Applicants submit an application and are evaluated in accordance with statutory and regulatory requirements (see 12 CFR 1806). The CDFI Fund requires BEA Program awards to be used for BEA Qualified Activities, as defined under the BEA Program regulations. Award Recipients are required to report how the award was used to the CDFI Fund.

The CDFI Program is authorized by the Riegle Community Development Banking and Financial Institutions Act of 1994 (Pub. L. 103–325, 12 U.S.C. 4701 *et seq.*). The CDFI Program uses federal resources to invest in and build the capacity of CDFIs to serve low income people and communities lacking adequate access to affordable financial products and services. The CDFI Fund created the Native Initiatives, which includes the NACA Program, to further support the creation and expansion of Native CDFIs. The CDFI Program and NACA Program provide (i) Financial Assistance (FA) awards to CDFIs and Native CDFIs that have Comprehensive Business Plans for creating demonstrable community development impact through the deployment of credit, capital, and financial services within their respective Target Markets or the expansion into new Investment Areas, Low-Income Targeted Populations, or Other Targeted Populations, and (ii) Technical Assistance (TA) grants to CDFIs and Native CDFIs and entities proposing to become CDFIs or Native CDFIs in order to build their capacity to better address the community development and capital access needs of their existing or proposed Target Markets and/or to become certified CDFIs. These competitive awards support and enhance the ability of these organizations to meet the needs of the communities they serve. Applicants submit an application and are evaluated in accordance with statutory and regulatory requirements (see 12 CFR 1805). The CDFI Fund requires CDFI Program and NACA Program awards to be used to support specific FA or TA activities. Award Recipients are required to report how the award was used to the CDFI Fund.

2. Method of collection and use of data

This data will be collected electronically from BEA Program, CDFI Program, and NACA Program award Recipients who must submit a Uses of Award Report Form to report on the progress of their expenditures per their Assistance Agreements with the CDFI Fund.

3. Use of Information Technology

The CDFI Fund uses a web-based, information technology system called the Awards Management Information System (AMIS). BEA Program, CDFI Program, and NACA Program award Recipients have individual accounts, which will allow them to access, save, and submit the Uses of Award Report Form.

4. Efforts to identify duplication

Similar information is not available from other sources. The Uses of Award Report Form does not duplicate any other CDFI Fund or Federal program information gathering tool.

5. Impact on small entities

This collection of information does not have a significant impact on small entities.

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

The CDFI Fund cannot administer BEA Program, CDFI Program, or NACA Program awards and fulfill statutory obligations without the collection of this data.

7. Circumstances requiring special information collection

Not applicable.

8. Solicitation of comments on information collection

Comments on the Uses of Award Report Form were solicited in the Federal Register on July 29, 2016, at 81 FR 50056. The CDFI Fund received two comments from the Opportunity Finance Network (OFN). Please see Appendix A for the comments and an explanation as to how they were addressed.

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 Federal regulations with respect to confidentiality of the information provided in this collection of information. The CDFI Fund has provided no other assurances of confidentiality to respondents.

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 of burden of information collection

The total hour burden of this information collection is 325 hours. Each collection is expected to take 1.0 hours. Based on past reporting periods, it is expected that there will be 80 BEA Program respondents and 245 respondents across the CDFI Program and NACA Program. Therefore, 80 BEA Program respondents x 1 response per year x 1.0 hour = 80 hours and 245 CDFI Program and NACA Program respondents x 1 response per year x 1.0 hour = 245 hours.

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|                               | # of Respondents | # Responses Per Respondent | Hours Per Response | Annual Burden Hours |
|-------------------------------|------------------|----------------------------|--------------------|---------------------|
| BEA Program                   | 80               | 1                          | 1                  | 80                  |
| CDFI Program and NACA Program | 245              | 1                          | 1                  | 245                 |
| TOTAL                         | 325              |                            |                    | 325                 |

13. Estimate total annual cost burden to respondents

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

14. Estimate of annualized cost to the Government

The cost to the Federal Government is the CDFI Fund staff and contractor time required to maintain the electronic system, review the data submitted for compliance and evaluation purposes, and collect follow-up information as needed.

15. Any program changes or adjustments

The CDFI Fund modified this information collection in order to reduce the number of distinct CDFI Fund forms and create a form that can be used across the BEA Program, CDFI Program, and NACA Program. As part of this modification, the name of the form was modified from the “BEA Program Award Report Form” to the “Uses of Award Report Form.”

16. Plans for information tabulation and publication

Confidential or proprietary information collected through the Uses of Award Form will not be published.

17. Reasons for not displaying expiration date of OMB approval

The CDFI Fund intends to display the expiration date of the OMB approval on the Uses of Award Form.

18. Explanation of exception to certification statement

Not applicable.

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

Not applicable.

Appendix A

| <b>Respondent</b> | <b>Affiliation</b>            | <b>Organization</b>         | <b>Comment</b>   | <b>CDFI Fund Response</b>  |
|-------------------|-------------------------------|-----------------------------|--|--|
| Dafina Williams   | Vice President, Public Policy | Opportunity Finance Network | The CDFI Fund should consider clarifying that the proposed “Use of Award” form will replace the “Uses of Financial Assistance Report” currently submitted by award recipients. If so, the new proposed form captures additional information from recipients by requesting a short “Description of Activity” in addition to the “Category of Activity”, which OFN supports as it will help recipients demonstrate they have met their Performance Goals.                  | The CDFI Fund will include instructions within guidance materials for the CDFI Program and NACA Program to clarify that the “Uses of Award Report Form” will replace the “Uses of Financial Assistance Report” and “Uses of Technical Assistance” Report.” |
| Dafina Williams   | Vice President, Public Policy | Opportunity Finance Network | The CDFI Fund should consider clarifying the time period for which recipients are to complete the form. The proposed form states the recipient must report on its uses of the TA Award or FA Award for its full reporting period. However, the proposed form appears to only contain space to collect information from a single year’s reporting, whereas the current “Use of Financial Assistance Report” allows recipients to input the full three years of reporting. | The CDFI Fund will include instructions within guidance materials to clarify annual reporting requirements.  |