

**DEPARTMENT OF THE TREASURY**  
**COMMUNITY DEVELOPMENT FINANCIAL INSTITUTIONS FUND**  
1500 PENNSYLVANIA AVENUE, NW  
WASHINGTON, D.C. 20220



**Supporting Statement for Paperwork Reduction Act Submissions**  
**Community Development Financial Institutions Fund (CDFI Fund)**  
**Community Development Financial Institutions Program (CDFI Program), Native**  
**American CDFI Assistance Program (NACA Program) and Healthy Food Financing**  
**Initiative-Financial Assistance (HFFI-FA) Application**

**A. Justification**

1. Circumstances necessitating collection of information

Pursuant to the Riegle Community Development Banking and Financial Institutions Act of 1994, as amended (the Act, 12 USC 4701 et seq.), the Community Development Financial Institutions Program (CDFI Program) provides financial and technical assistance to selected applicants and Community Development Financial Institutions (CDFIs) in order to enhance their ability to make loans and investments and provide services for the benefit of designated Investment Areas and Targeted Populations.

The current application form is submitted through a CDFI Fund-managed web-based application portal that is used by CDFI Program, Native American CDFI Assistance (NACA), and Healthy Food Financing Initiative (HFFI) applicants to apply for assistance. HFFI applications are consolidated within CDFI and NACA Program applications. The information collected will be used to select awardees, based on a merit-based selection process. The requested information is required by the CDFI Program regulations (12 CFR Part 1805) and respective Notice of Funds Availabilities.

Through annual Appropriations the Community Development Financial Institutions Fund (CDFI Fund) provides funding for CDFIs that provide Financial Products for Healthy Food Retail and Healthy Food Non-Retail Outlets in its Target Markets. The CDFI Fund created the Healthy Food Financing Initiative-Financial Assistance (HFFI-FA) Application in response to the annual Appropriations.

2. Method of collection and use of data

The CDFI Fund will collect data once per funding round by means of an application. Applicants must complete and upload the application through a CDFI Fund-managed web-based application portal with the exception of Standard Form 424 (SF-424), which 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 publicly 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

The CDFI Fund is requesting an emergency PRA review to include the 2019 Healthy Food Financing Initiative-Financial Assistance Application; therefore, advance comments from the public were not solicited.

However, Treasury is requesting approval of this reinstatement by May 6, 2019 and has submitted a notice to the *Federal Register* soliciting public comments during the period of OMB review.

The CDFI Fund also receives regular input from the financial institutions it serves and has taken all practical steps to minimize the burden of collecting HFFI-FA applications. This includes administering HFFI-FA awards in conjunction with the annual CDFI Program and NACA Program application process to eliminate potential duplication.

#### 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 information provided by CDFI Program and NACA Program applicants. Access to information in the application is restricted to the applicant, their designated representatives, and CDFI Fund staff required to complete non-disclosure agreements.

#### 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.

<b>Affected Public</b>	<b># Respondents</b>	<b># Responses Per Respondent</b>	<b>Total Annual Responses</b>	<b>Hours per Response</b>	<b>Total Hours</b>	<b>Time Value (per hour)</b>	<b>Monetized Burden Hours</b>
Financial Assistance Application	400	1	400	100	40,000	\$58.54 <sup>1</sup>	\$ 2,341,600
Technical Assistance Application	100	1	100	50	5,000	\$58.54 <sup>2</sup>	\$292,700
<b>TOTAL</b>	<b>500</b>	<b>1</b>	<b>500</b>		<b>45,000</b>		<b>\$2,634,300</b>

#### 13. Estimate of total annual cost burden to respondents

Per the table in Question 12, the average annual cost burden to respondents is \$2,634,300. No purchase of equipment or services will need to be made by respondents for this information collection other than as required as a part of customary and usual business practices.

#### 14. Estimate of annualized cost to the Government

The cost to the Government is the CDFI Fund staff and contractor time required to review the submitted applications, maintain the electronic application system and collect follow-up information from applicants. It is not possible to accurately track expenses for the review process associated with this application. Staff at varying grades, both internal and external to the

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<sup>1</sup> The hourly rate is based on the national estimate for the median hourly wage for Financial Managers according the Bureau of Labor Statistics (<https://www.bls.gov/oes/current/oes113031.htm>)

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CDFI Fund, support application reviews at different levels throughout the application review period which often transcends fiscal years.

15. Any program changes or adjustments

This revised Information Collection Request (ICR) is being submitted to clear the 2019 HFFI application questions. These seven questions are completed by respondents as part of the larger Financial Assistance application and the burden for them is already accounted for in the existing approved burden under this control number. As such there is no change in burden due to these questions.

However, there was an error in the entry of data into ROCIS for the previous ICR submission which is being corrected here. The currently approved total burden of 65,000 hours is being reduced to 45,000 hours, matching what was estimated in the previous supporting statement.

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

There are no exceptions to the certification statement.

**Justification for Emergency Processing**

The Community Development Financial Institutions Fund (CDFI Fund) requests Emergency Processing for a revision to Office of Management and Budget (OMB) Control Number 1559-0021 in order to clear the current Healthy Food Financing Initiative-Financial Assistance (HFFI-FA) Application. The CDFI Fund receives an annual appropriation from Congress to fund HFFI-FA awards was appropriated \$22 million under the Consolidated Appropriations Act, 2019 (P.L. 116-6). The revision of this OMB number to include the current HFFI-FA Application will allow the CDFI Fund to provide HFFI-FA awards under the FY 2019 Community Development Financial Institutions Program (CDFI Program) and Native American CDFI Assistance (NACA Program) funding rounds which are expected to open May 6, 2019.

If normal clearance procedures were followed, CDFI Fund would be unable to collect the necessary HFFI-FA applications and disburse the funds that Congress has appropriated for this program during the 2019 funding round. Treasury requests approval of this reinstatement by May 6, 2019 and has submitted a notice to the Federal Register soliciting public comments during the period of OMB review.

The CDFI Fund receives regular input from the financial institutions it serves and has taken all practical steps to minimize the burden of collecting HFFI-FA applications. This includes administering HFFI-FA awards in conjunction with the annual CDFI Program and NACA Program application process to eliminate potential duplication.