Appendix A: Summary of Public Comments and CDFI & NACA Program Team Responses to Public Comments

#	Date of Comment	Organization	Author Name	Author Position	Category	Comment	CDFI & NACA Program Team Response
1.	5/13/2019	Accion	Gina Harman	CEO	Recommendation	Provide clarification on subcategories on Tables 12 and 13 for question 6c	The CDFI Fund has provided a drop-down of available sub-categories. The FA Guidance states to choose the closest option.
2.	5/13/2019	Accion	Gina Harman	CEO	Recommendation	Increase character count for question 7	The suggested character count limit change request was evaluated by staff and determined to be adequate as written. The character count for responses to this question will not be increased.
3.	5/13/2019	Accion	Gina Harman	CEO	Recommendation	Increase character count for Question 12	The suggested character count limit change request was evaluated by staff and determined to be adequate as written. The character count for responses to this question will not be increased.
4.	5/13/2019	Accion	Gina Harman	CEO	Recommendation	Increase character count for Question 14	The suggested character count limit change request was evaluated by staff and determined to be adequate as written. The character count for responses to this question will not be increased.
5.	5/13/2019	Accion	Gina Harman	CEO	Recommendation	Leave character count for Question 17	The suggested character count limit change request

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#	Date of Comment	Organization	Author Name	Author Position	Category	Comment	CDFI & NACA Program Team Response was evaluated by staff and determined to be adequate as written. The character count for responses to this question will not be increased.
6.	5/13/2019	Accion	Gina Harman	CEO	Recommendation	Change Title VI narrative to certification application instead of funding application	Removed all Title VI questions from application.
7.	5/13/2019	Accion	Gina Harman	CEO	Concern	PPC-FA & Opportunity Zone financial data is burdensome	The CDFI Fund will take this policy comment into consideration.
8.	5/13/2019	CEI	Keith Bisson	President	Recommendation	Provide feedback on how CDFI Fund reviews applications and disclose the score given on each section	The CDFI Fund will consider convening a post-award webinar to provide a high-level debriefing for applicants who did not receive an award.  For further information on the evaluation process, please see the "Base-FA Application Evaluation Process" guidance document.
9.	5/13/2019	CEI	Keith Bisson	President	Recommendation	Shift focus from increase in total lending to increase in specific lending. The applicant should be able to use their FA award to increase a specific lending product, and CDFI Fund should	The CDFI Fund will take this policy comment into consideration.

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#	Date of Comment	Organization	Author Name	Author Position	Category	Comment	CDFI & NACA Program Team Response
						propose a new FA Objective to allow this	
10.	5/13/2019	CEI	Keith Bisson	President	Recommendation	Compliance/PG&Ms should be commensurate with award received. If award amount is reduced, the applicant should not be held to the award request PG&M.	The CDFI Fund will take this policy comment into consideration.
11.	5/13/2019	CEI	Keith Bisson	President	Recommendation	Title VI requirements for award recipients only	Removed all Title VI questions from application.
12.	5/13/2019	CEI	Keith Bisson	President	Recommendation	Utilize OMB standard form to assure compliance with Title VI	Removed all Title VI questions from application.
13.	5/13/2019	CEI	Keith Bisson	President	Concern	Additional OCRD guidance	Removed all Title VI questions from application.
14.	5/13/2019	CEI	Keith Bisson	President	Concern	Additional clarification on Question 2 regarding Treasury's expectations and standards for engaging with minority populations. Additional guidance on how they engage with traditional CDFI financing.	Removed all Title VI questions from application.
15.	5/13/2019	CEI	Keith Bisson	President	Concern	Question 8. How often do federal agencies conduct Title VI reviews, and is there a publicly available website where award Recipients can receive copies of those reviews?	Removed all Title VI questions from application.
16.	5/13/2019	CEI	Keith Bisson	President	Concern	Question 12. CDFIs are lenders, not developers, although they may fund commercial and	Removed all Title VI questions from application.

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#	Date of Comment	Organization	Author Name	Author Position	Category	residential real estate projects. How does this question apply to CDFIs who aren't involved in the facility selection process and only originate the loan? In addition, Treasury should define "facility" for the purpose of this question.	CDFI & NACA Program Team Response
17.	5/13/2019	CEI	Keith Bisson	President	Recommendation	Question 13. Treasury should define "existing assistance" in this sentence.	Removed all Title VI questions from application.
18.	5/13/2019	CEI	Keith Bisson	President	Recommendation	Define "program beneficiaries" and "benefits or services" for question 14	Removed all Title VI questions from application.
19.	5/13/2019	CEI	Keith Bisson	President	Recommendation	Request for comment to not overlap with applications	The CDFI Fund will take this customer services comment into consideration.
20.	5/12/2019	CU Strategic Planning	Stacy S. Augustine	President/ CEO	Recommendation	More transparent NOFA release date	The CDFI Fund will take this policy comment into consideration.
21.	5/12/2019	CU Strategic Planning	Stacy S. Augustine	President/ CEO	Recommendation	Ability to go back and edit application after submission	The CDFI Fund AMIS system cannot accommodate this change request. However, the online application has a new PDF preview capability that allows applicants to preview their application in full before submitting it, mitigating

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#	Date of Comment	Organization	Author Name	Author Position	Category	Comment	CDFI & NACA Program Team Response the need to edit after submission.
22.	5/12/2019	CU Strategic Planning	Stacy S. Augustine	President/ CEO	Recommendation	Review request for potential applicant to be certified before the NOFA release	The CDFI Fund will take this policy comment into consideration.
23.	5/12/2019	CU Strategic Planning	Stacy S. Augustine	President/ CEO	Concern	Allow for a more narrow focus rather than overall focus - some CDFIs have a very specific focus and some credit unions do not	The CDFI Fund will take this policy comment into consideration.
24.	5/12/2019	CU Strategic Planning	Stacy S. Augustine	President/ CEO	Concern	Application focuses on Target Market and entire portfolio in describing needs/challenges, which is a disadvantage to an organization that doesn't have a specific focus.	The CDFI Fund will take this policy comment into consideration and will provide additional clarification in guidance materials if warranted.
25.	5/12/2019	CU Strategic Planning	Stacy S. Augustine	President/ CEO	Concern	FA Objectives and achievement of strategic goals correlate, creating difficulty for an organization to summarize its general goals and goals that apply to the FA Objectives. Also difficult to do in character limit. Strategic goals over the next 5 years, and projected financials over the next 3 years causes confusion. Should keep both to 3 years.	The CDFI Fund will take this policy comment into consideration and will provide additional clarification in guidance materials if warranted, as the statute requires a 5 year strategic plan.
26.	5/12/2019	CU Strategic Planning	Stacy S. Augustine	President/ CEO	Clarification	Narrow risk questions to matters only relevant to the application. Burdensome to narrate risk for all strategic goals.	CDFI Fund will take this policy comment into consideration and will provide additional

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#	Date of Comment	Organization	Author Name	Author Position	Category	Comment	CDFI & NACA Program Team Response clarification in guidance materials if warranted.
27.	5/12/2019	CU Strategic Planning	Stacy S. Augustine	President/ CEO	Concern	Impractical to address all data sources in character limit, consider narrowing the question	The suggested character count limit change request was evaluated by staff and determined to be adequate as written. The character count for responses to this question will not be increased.
28.	5/12/2019	CU Strategic Planning	Stacy S. Augustine	President/ CEO	Recommendation	Revise question 13 to entities that are not required to have updated policies in place for the requested information	The CDFI Fund has added a "N/A" drop-down selection in Question 13 for regulated institutions.
29.	5/12/2019	CU Strategic Planning	Stacy S. Augustine	President/ CEO	Recommendation	Increase key staff character count on charts to avoid overlapped information	The suggested character count limit change request was evaluated by staff and determined to be adequate as written. The character count for responses to this question will not be increased.
30.	5/12/2019	CU Strategic Planning	Stacy S. Augustine	President/ CEO	Recommendation	Add "Regulatory Findings" to the audit findings section with opportunity to explain	The CDFI Fund has added the phrase "regulatory findings" to the "audit findings" component of this question.
31.	5/12/2019	CU Strategic Planning	Stacy S. Augustine	President/ CEO	Recommendation	Eliminate Question 7 and combine Question 5 and Question 15	The CDFI Fund has modified Question 15 to avoid risk of overlapping responses with Question 5.

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#		Date of Comment	Organization	Author Name	Author Position	Category	Comment	CDFI & NACA Program Team Response
	32.	5/12/2019	CU Strategic Planning	Stacy S. Augustine	President/ CEO	Recommendation	Bring back tables that helped applicant understand what information was required to input. The 3-year financial projection does not align with when the award is received (middle of the year). Suggestion - historical three years, prior year, current year and projected three years	The CDFI Fund will take this customer service comment into consideration. The online application now customizes and customizes the correct data input based on the each applicant's FYE.
	33.	5/12/2019	CU Strategic Planning	Stacy S. Augustine	President/ CEO	Recommendation	Leave out Title VI narrative - should be part of grant reporting, not enough characters to explain, burdensome to collect information, applicant is already complying with ECOA, disadvantage to small applicants, expensive data processing charges	Removed all Title VI questions from application.
	34.	5/12/2019	CU Strategic Planning	Stacy S. Augustine	President/ CEO	Recommendation	Evaluate each question individually - heavier weighing of sections that have short character limits is uneven.	The CDFI Fund assesses each application holistically, therefore the character length of any given question is not tied to the weighting of any particular section.
	35.	5/13/2019	Inclusiv	Terry Ratigan	CDFI Analyst	Concern	Increase the quality and quantity of data available to the CDFI Fund and industry	The CDFI Fund will take this customer service comment into consideration.
	36.	5/13/2019	Inclusiv	Terry	CDFI Analyst	Concern	Increase the utility of data	The CDFI Fund will work

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			Ratigan			provided by CDFIs to ensure that a single data collection can serve multiple purposes	with IT staff and regulators to reduce data entry burden.
37.	5/13/2019	Inclusiv	Terry Ratigan	CDFI Analyst	Concern	Increase the efficiency and effectiveness of the CDFI Program by providing better and more consistent data for all funding applicants.	The CDFI Fund will take this customer service comment into consideration.
38.	5/13/2019	Inclusiv	Terry Ratigan	CDFI Analyst	Concern	Increase the quality of the CDFI Program applicant pool with stronger, clearer eligibility requirements	The CDFI Fund will take this customer service comment into consideration.
39.	5/13/2019	Inclusiv	Terry Ratigan	CDFI Analyst	Recommendation	Increase access to the CDFI Program for smaller institutions	The CDFI Fund will take this policy comment into consideration.
40.	5/13/2019	Inclusiv	Terry Ratigan	CDFI Analyst	Concern	Incentivize CDFIs to make better use of data to expand services in CDFI Target Markets	The CDFI Fund will take this policy comment into consideration.
41.	5/13/2019	Inclusiv	Terry Ratigan	CDFI Analyst	Concern	Balance the costs of data reporting with the expected benefits and levels of participation of individual CDFIs	The CDFI Fund will take this CDFI reporting comment into consideration.
42.	5/13/2019	Inclusiv	Terry Ratigan	CDFI Analyst	Recommendation	Reduce the total burden of CDFI reporting and allow more resources to be devoted to serving people in CDFI Target Markets.	The CDFI Fund will take this CDFI reporting comment into consideration.
43.	5/13/2019	Inclusiv	Terry Ratigan	CDFI Analyst	Recommendation	Produce a document that explains how each data point is used and why it is needed	The CDFI Fund will take this customer service comment into consideration.

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#	Date of Comment	Organization	Author Name	Author Position	Category	Comment	CDFI & NACA Program Team Response
44	. 5/13/2019	Inclusiv	Terry Ratigan	CDFI Analyst	Recommendation	Pre-populate application questions with publicly available information	CDFI Fund will work with IT staff and regulators to reduce data entry burden.
45	. 5/13/2019	Inclusiv	Terry Ratigan	CDFI Analyst	Recommendation	Lower the TA Eligibility threshold so larger CDFI credit unions can participate in this application.	The CDFI Fund will take this policy comment into consideration.
46	. 5/13/2019	Inclusiv	Terry Ratigan	CDFI Analyst	Recommendation	Institute a single certification and funding round track set for 180 days after the end of the fiscal year.	The CDFI Fund will take this CDFI reporting comment into consideration.
47	. 5/13/2019	Inclusiv	Terry Ratigan	CDFI Analyst	Recommendation	Slimmer reporting requirements: 1) CDFI Awardees - Detailed TLRs that serve as their ACRs 2) Prospective FA Applicants - de-identified transaction level ACR 3) Non-FA CDFIs - re-certify with a streamlined ACR	The CDFI Fund will take this CDFI reporting comment into consideration.
48	. 5/13/2019	Inclusiv	Terry Ratigan	CDFI Analyst	Recommendation	Provide detailed debriefings for all CDFI Program applicants.	The CDFI Fund will consider convening a post-award webinar to provide a high-level debriefing for applicants who did not receive an award.
							For further information on the evaluation process, please see the "Base-FA Application Evaluation Process" guidance

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#	Date of Comment	Organization	Author Name	Author Position	Category	Comment	CDFI & NACA Program Team Response document.
49.	5/13/2019	LISC	Matt Josephs	Senior Vice President	Recommendation	Be more transparent on how the CDFI Fund is reviewing applications. Provide feedback on the scores for each section listed in the NOFA.	The CDFI Fund will consider convening a post-award webinar to provide a high-level debriefing for applicants who did not receive an award.  For further information on the evaluation process, please see the "Base-FA"
							Application Evaluation Process" guidance document.
50.	5/13/2019	LISC	Matt Josephs	Senior Vice President	Recommendation	Shift focus from increase in total lending to increase in specific lending. The applicant should be able to use their FA award to increase a specific lending product, and CDFI Fund should propose a new FA Objective to allow this	The CDFI Fund will take this policy comment into consideration.
51.	5/13/2019	LISC	Matt Josephs	Senior Vice President	Recommendation	Award size should not be capped at \$1M, and should be based on the CDFIs ability to deploy the award, and how the award is used in conjunction with the FA Objectives. CDFI Fund should create more categories outside of SECA/Core to compete against one another. \$700K and \$1M is	For further information on the evaluation and award sizing process, please see the "Base-FA Application Evaluation Process" guidance document.

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#	Date of Comment	Organization	Author Name	Author Position	Category	Comment	CDFI & NACA Program Team Response
52	. 5/13/2019	LISC	Matt Josephs	Senior Vice President	Recommendation	not a large variance.  Compliance/PG&Ms should be commensurate with award received. If award amount is reduced, the applicant should not be held to the award request PG&M	CDFI Fund will take this policy comment into consideration and will provide additional clarification in guidance materials if warranted.
53	. 5/13/2019	LISC	Matt Josephs	Senior Vice President	Recommendation	Provide feedback to all applicants as to why they received a reduction in award, did not receive award, etc.	The CDFI Fund will consider convening a post-award webinar to provide a high-level debriefing for applicants who did not receive an award.  For further information on the evaluation process, please see the "Base-FA Application Evaluation Process" guidance document.
54	. 5/13/2019	LISC	Matt Josephs	Senior Vice President	Recommendation	Define "close" and "deployment" for the purposes of the CDFI Program application and Assistance Agreement	The CDFI Fund has clarified requirements through text changes in guidance materials.
55	. 5/13/2019	LISC	Matt Josephs	Senior Vice President	Concern	Question 1. Can the CDFI Fund prepopulate this field using annual CDFI certification data instead of asking applicants to resubmit this information?	The CDFI Fund will take this customer service comment into consideration.
56	. 5/13/2019	LISC	Matt Josephs	Senior Vice President	Concern	<ul><li>a) Table 1. Table 1 states</li><li>"Clients and Beneficiaries</li></ul>	The CDFI Fund has addressed these comments

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# Date of Comment	Organization	Author Name	Author Position	Category	Comment	CDFI & NACA Program Team Response
					Receiving Financial Products" although lists Financial Products, Financial Services, and Development Services under Aggregate Activity which is inconsistent with the title. Is this due to AMIS population taking place in other places in the application? b) Table 1. The CDFI Fund should allow applicants to count a client or beneficiary in both Financial Products and Development Services when they receive both forms of assistance. c) Table 3. Moderate Income should be defined as 81%-120% and Low Income should be 50%- 80%. d) Table 5. The table requests the amount of loan and equity outstanding in each state although the title should be reworded to reflect this since it states "Application Geographic Areas", which makes it seem like the CDFI Fund wants information on how the award will be geographically targeted. LISC recommends this table be	in its revisions to related applications questions and tables. The definition of each income quintile has been clarified, as well as table titles and headings.

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#	Date of Comment	Organization	Author Name	Author Position	Category	Comment	CDFI & NACA Program Team Response
						titled "Table 5. Applicant's Geographic Financing Coverage" or something similar	
57.	5/13/2019	LISC	Matt Josephs	Senior Vice President	Recommendation	Coverage" or something similar.  1 - CDFI Fund should clarify for Applicants when they should anticipate the beginning of the three year award period since it's referenced in multiple tables.  2 - CDFI Fund should specify for Applicants what information they are being held to in the application for compliance purposes and provide additional clarity in the introductory paragraph before Question 6a.  a) Table 10. Include a "\$ or %" in front of "Projected Activity to this Area."  b) Table 12. Change third row in Financial Product table to state: Must be 5% or less of existing portfolio for most recently completed historic fiscal year to be considered a new Financial Product (remove "or service" since that's not applicable in this table).  c) Table 12. "Intermediary Lending to Nonprofits and CDFIs" appears twice in the table so one row should be	The CDFI Fund has addressed these comments in its revisions to related applications questions and tables. The online application now customizes and makes clear the correct year that each applicant is required to enter data in, based on the each applicant's FYE.

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#	Date of Comment	Organization	Author Name	Author Position	Category	removed. d) Table 13. Change fourth row to state: Must be 5% or less of existing portfolio for most recently completed historic fiscal year to be considered a new Financial Service (remove "financial product or" since that's not applicable in this table).	CDFI & NACA Program Team Response
58.	5/13/2019	LISC	Matt Josephs	Senior Vice President	Recommendation	Table 17. The CDFI Fund should specify what fiscal year time period previous Award Recipients should cover for Table 17 and the narrative response.	The CDFI Fund has eliminated Table 17.
59.	5/13/2019	LISC	Matt Josephs	Senior Vice President	Recommendation	Title VI requirements are required for federal financial assistance award Recipients. Why is this information being collected at application instead of post award reporting? This increases applicant burden, without a clear rationale. If possible, Treasury should only require this reporting for award Recipients.	Removed all Title VI questions from application.
60.	5/13/2019	LISC	Matt Josephs	Senior Vice President		Instead of having individual questions for Award Recipients, can the CDFI Fund utilize an OMB standard form, which	Removed all Title VI questions from application.

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#	Date of Comment	Organization	Author Name	Author Position	Category	requires the Recipient to assure its compliance with Treasury's Title VI requirements? This would reduce award Recipient burden and ensure compliance through certifications and Treasury audits.	CDFI & NACA Program Team Response
61.	5/13/2019	LISC	Matt Josephs	Senior Vice President		The CDFI Fund or ORCD should provide as much guidance as possible on these questions since they don't fit well with the CDFI Program's award model. If possible, Treasury should reference civil rights regulations, guidance documents, or model forms where available to help award Recipients.	Removed all Title VI questions from application.
62.	5/13/2019	LISC	Matt Josephs	Senior Vice President	Recommendation	Question 1. Provide additional OCRD guidance	Removed all Title VI questions from application.
63.	5/13/2019	LISC	Matt Josephs	Senior Vice President	Concern	Question 2. Provide expectations and standards for question 2 regarding engaging minority populations when lending. Data collection for this requirement is burdensome/ Many CDFIs are eliminated if they lend to third parties, but the third parties are the low-income project executor. OCRD Title VI question should be eliminated	Removed all Title VI questions from application.

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#	Date of Comment	Organization	Author Name	Author Position	Category	Comment	CDFI & NACA Program Team Response
64.	5/13/2019	LISC	Matt Josephs	Senior Vice President	Recommendation	Questions 3, 4, 5, and 11.  Treasury should explicitly state that CDFI Program applicants and award Recipients do not need to complete this question unless they are a Depository Institution Holding Company, which intends to pass through the dollars to a bank.	Removed all Title VI questions from application.
65.	5/13/2019	LISC	Matt Josephs	Senior Vice President	Recommendation	Question 6. Provide additional clarification/guidance on Title VI compliance	Removed all Title VI questions from application.
66.	5/13/2019	LISC	Matt Josephs	Senior Vice President	Concern	Question 8. How often do federal agencies conduct Title VI reviews, and is there a publicly available website where award Recipients can receive copies of those reviews?	Removed all Title VI questions from application.
67.	5/13/2019	LISC	Matt Josephs	Senior Vice President	Concern	Question 12. CDFIs are lenders, not developers, although fund commercial and residential real estate projects. How does this question apply to CDFIs who aren't involved in the facility selection process and only originate the loan? In addition, Treasury should define "facility" for the purpose of this question.	Removed all Title VI questions from application.
68.	5/13/2019	LISC	Matt Josephs	Senior Vice President	Recommendation	Question 13. Treasury should define "existing assistance" in this sentence.	Removed all Title VI questions from application.

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#	Date of Comment	Organization	Author Name	Author Position	Category	Comment	CDFI & NACA Program Team Response
69.	5/13/2019	LISC	Matt Josephs	Senior Vice President	Recommendation	Question 14 - Define "program beneficiaries" and "benefits or services"	Removed all Title VI questions from application.
70.	5/13/2019	LISC	Matt Josephs	Senior Vice President	Recommendation	The CDFI Fund should include a paragraph, which describes current HFFI-FA deployment compliance requirements so applicants understand what they will be held to if they receive an award.	CDFI Fund will take this comment into consideration and will provide additional clarification in guidance materials if warranted.
71.	5/13/2019	LISC	Matt Josephs	Senior Vice President	Recommendation	Define HFFI terms, provide additional HFFI guidance materials that are applicable to application completion	CDFI Fund will take this comment into consideration and will provide additional clarification in guidance materials if warranted.
72.	5/13/2019	LISC	Matt Josephs	Senior Vice President	Recommendation	The CDFI Fund should list the total points available per HFFI-FA section.	The CDFI Fund has added this information.
73.	5/13/2019	NeighborWorks America	Kirsten Johnson- Obey	Senior Vice President, Public Policy and Leg. Affairs	Concern	Question #2/13: AMIS should interface with applications, avoiding duplicate entry. Annual certifications should feed into the applications	CDFI Fund will work with IT staff and regulators to reduce data entry burden.
74.	5/13/2019	NeighborWorks America	Kirsten Johnson- Obey	Senior Vice President, Public Policy and Leg. Affairs	Concern	Review request for potential applicant to be certified before the NOFA release	The CDFI Fund will take this policy comment into consideration.
75.	5/13/2019	NeighborWorks America	Kirsten Johnson-	Senior Vice President,	Concern	Residential mortgage lending should be its own line rather than	The CDFI Fund will take this policy comment into

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#	Date of Comment	Organization	Author Name Obey	Author Position Public Policy and Leg. Affairs	Category	Comment  consolidating under Affordable Housing	CDFI & NACA Program Team Response consideration.
76.	5/13/2019	NeighborWorks America	Kirsten Johnson- Obey	Senior Vice President, Public Policy and Leg. Affairs	Concern	Maintain eligibility of supplies/equipment for TA award	The CDFI Fund will take this policy comment into consideration. The CDFI Fund uses the Uniform Administrative Requirements (UAR) that dictates all eligible uses for TA.
77.	5/13/2019	NeighborWorks America	Kirsten Johnson- Obey	Senior Vice President, Public Policy and Leg. Affairs	Concern	NACA - create fifth objective to allow Core CDFIs to develop products/services	The CDFI Fund will take this policy comment into consideration.
78.	5/13/2019	NeighborWorks America	Kirsten Johnson- Obey	Senior Vice President, Public Policy and Leg. Affairs	Recommendation	Provide feedback on application process, allow applicants to read reviewer comments	The CDFI Fund will consider convening a postaward webinar to provide a high-level debriefing for applicants who did not receive an award.  For further information on the evaluation process, please see the "Base-FA Application Evaluation Process" guidance
79.	5/13/2019	Opportunity Finance	Dafina Williams	Vice President - Public Policy	Recommendation	Provide feedback and explanation that the CDFI Fund	document.  The CDFI Fund will consider convening a post-

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#		Date of Comment	Organization	Author Name	Author Position	Category	Comment	CDFI & NACA Program Team Response
			Network				previously provided to help Applicant understand their outcome. Provide greater clarity on evaluation process	award webinar to provide a high-level debriefing for applicants who did not receive an award.
								For further information on the evaluation process, please see the "Base-FA Application Evaluation Process" guidance document.
	80.	5/13/2019	Opportunity Finance Network	Dafina Williams	Vice President - Public Policy		PG&Ms/Compliance should be commensurate with award size. Application should be structured the same as the award policy - the award is not for specific projects, but is flexible capital. CDFI Fund should provide guidance on how organizations can address unforeseen changes.	The CDFI Fund will take this policy comment into consideration.
	81.	5/13/2019	Opportunity Finance Network	Dafina Williams	Vice President - Public Policy		Title VI requirements are burdensome. CDFI Fund needs to provide additional guidance, sample documents, etc. Need to clarify if this is needed for new applicants, how this information is used, and which questions apply to which applicants. Suggestion for this information to only apply to awardees.	Removed all Title VI questions from application.
	82.	5/13/2019	Opportunity	Dafina	Vice President	Recommendation	OFN Members noted that it	The CDFI Fund will take

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#	Date of Comment	Organization Finance Network	Author Name Williams	Author Position - Public Policy	Category	would be helpful to have templates for the narrative (in Microsoft Word) and the charts (in Microsoft Excel) so applicants can work on them offline before entering them into the application.	CDFI & NACA Program Team Response this customer service comment into consideration.
83.	5/13/2019	Opportunity Finance Network	Dafina Williams	Vice President - Public Policy	Recommendation	Provide "hints" and "tips" throughout application, and provide definitions of new terms and data points.	The CDFI Fund will take this customer service comment into consideration.
84.	6/20/2019	Community Development Bankers Assoc.	Jeannine Jacokes	CEO	Recommendation	Ensure the requested Title VI Narrative is not duplicative of existing requirements - this could unfairly bias a funding request. Exemption from this requirement is requested. In lieu, the CDFI Fund should consult with regulators on the Applicant's compliance with Title VI.	Removed all Title VI questions from application.
85.	5/13/2019	Tampa Bay Federal Credit Union	Richard Grammatic a	President/CEO	Recommendation	Lower the TA Eligibility threshold so larger CDFI credit unions can participate in this application.	The CDFI Fund will take this policy comment into consideration.
86.	5/13/2019	Lake Trust Credit Union	Bill Lantzy	Product Manager	Recommendation	Lower the TA Eligibility threshold so larger CDFI credit unions can participate in this application.	The CDFI Fund will take this policy comment into consideration.
87.	5/13/2019	ELGA Credit Union	Karen Church	CEO	Recommendation	Lower the TA Eligibility threshold so larger CDFI credit	The CDFI Fund will take this policy comment into

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#	Date of Comment	Organization	Author Name	Author Position	Category	Comment	CDFI & NACA Program Team Response
						unions can participate in this application.	consideration.
88.	5/13/2019	Lower East Side People's Fed CU	Maureen A. Genna	CEO	Recommendation	Lower the TA Eligibility threshold so larger CDFI credit unions can participate in this application.	The CDFI Fund will take this policy comment into consideration.
89.	5/13/2019	Tampa Bay Federal Credit Union	Richard Grammatic a	President/CEO	Recommendation	Institute a single certification and funding round track set for 180 days after the end of the fiscal year.	The CDFI Fund will take this CDFI reporting comment into consideration.
90.	5/13/2019	Lake Trust Credit Union	Bill Lantzy	Product Manager	Recommendation	Institute a single certification and funding round track set for 180 days after the end of the fiscal year.	The CDFI Fund will take this CDFI reporting comment into consideration.
91.	5/13/2019	ELGA Credit Union	Karen Church	CEO	Recommendation	Institute a single certification and funding round track set for 180 days after the end of the fiscal year.	The CDFI Fund will take this CDFI reporting comment into consideration.
92.	5/13/2019	Lower East Side People's Fed CU	Maureen A. Genna	CEO	Recommendation	Institute a single certification and funding round track set for 180 days after the end of the fiscal year.	The CDFI Fund will take this CDFI reporting comment into consideration.
93.	5/13/2019	Tampa Bay Federal Credit Union	Richard Grammatic a	President/CEO	Recommendation	Slimmer reporting requirements: 1) CDFI Awardees - Detailed TLRs that serve as their ACRs 2) Prospective FA Applicants - de-identified transaction level ACR 3) Non-FA CDFIs - re-certify with a streamlined ACR	The CDFI Fund will take this CDFI reporting comment into consideration.
94.	5/13/2019	Lake Trust	Bill Lantzy	Product	Recommendation	Slimmer reporting requirements:	The CDFI Fund will take

Appendix A: Summary of Public Comments and CDFI & NACA Program Team Responses to Public Comments

#	Date of Comment	Organization Credit Union	Author Name	Author Position Manager	Category	1) CDFI Awardees - Detailed TLRs that serve as their ACRs 2) Prospective FA Applicants - de-identified transaction level ACR 3) Non-FA CDFIs - re-certify	CDFI & NACA Program Team Response this CDFI reporting comment into consideration.
95.	5/13/2019	ELGA Credit Union	Karen Church	CEO	Recommendation	with a streamlined ACR  Slimmer reporting requirements:  1) CDFI Awardees - Detailed  TLRs that serve as their ACRs  2) Prospective FA Applicants - de-identified transaction level  ACR  3) Non-FA CDFIs - re-certify  with a streamlined ACR	The CDFI Fund will take this CDFI reporting comment into consideration.
96.	5/13/2019	Lower East Side People's Fed CU	Maureen A. Genna	CEO	Recommendation	Slimmer reporting requirements: 1) CDFI Awardees - Detailed TLRs that serve as their ACRs 2) Prospective FA Applicants - de-identified transaction level ACR 3) Non-FA CDFIs - re-certify with a streamlined ACR	The CDFI Fund will take this CDFI reporting comment into consideration.
97.	5/13/2019	Tampa Bay Federal Credit Union	Richard Grammatic a	President/CEC	Recommendation	Provide detailed debriefings for all CDFI Program applicants.	The CDFI Fund will consider convening a post-award webinar to provide a high-level debriefing for applicants who did not receive an award.  For further information on

Appendix A: Summary of Public Comments and CDFI & NACA Program Team Responses to Public Comments

#	Date of Comment	Organization	Author Name	Author Position	Category	Comment	CDFI & NACA Program Team Response the evaluation process, please see the "Base-FA Application Evaluation Process" guidance document.
98.	5/13/2019	Lake Trust Credit Union	Bill Lantzy	Product Manager	Recommendation	Provide detailed debriefings for all CDFI Program applicants.	The CDFI Fund will consider convening a post-award webinar to provide a high-level debriefing for applicants who did not receive an award.  For further information on the evaluation process, please see the "Base-FA Application Evaluation Process" guidance document.
99.	5/13/2019	ELGA Credit Union	Karen Church	CEO	Recommendation	Provide detailed debriefings for all CDFI Program applicants.	The CDFI Fund will consider convening a post-award webinar to provide a high-level debriefing for applicants who did not receive an award.  For further information on the evaluation process, please see the "Base-FA Application Evaluation Process" guidance document.

Appendix A: Summary of Public Comments and CDFI & NACA Program Team Responses to Public Comments

#	Date of Comment	Organization	Author Name	Author Position	Category	Comment	CDFI & NACA Program Team Response
100.	5/13/2019	Lower East Side People's Fed CU	Maureen A. Genna	CEO	Recommendation	Provide detailed debriefings for all CDFI Program applicants.	The CDFI Fund will consider convening a post-award webinar to provide a high-level debriefing for applicants who did not receive an award.
							For further information on the evaluation process, please see the "Base-FA Application Evaluation Process" guidance document.