

Appendix A. CY 2021-23 NMTC Program Application PRA - Summary of Public Comments and CDFI Fund Responses

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
1	3/1/2021	Blooming Ventures	Elaine DiPietro	General	Application	IT Enhancement	Allow Applicant to have rich text format to bold, underline, and add bullets in narrative response	The CDFI Fund will consider additional enhancements to AMIS functionality in future application rounds.
2	3/1/2021	Self-Help Venture Fund	Amanda Frazier Wong	Community Outcomes	Question 26	Application	Add "financing multi-service community org" as a new community outcome category	This comment would not reduce burden in completing the NMTC Program Application and is not necessary for the CDFI Fund's evaluation.
3	3/1/2021	Self-Help Venture Fund	Amanda Frazier Wong	Application Information	Question 3	Review Process	Provide priority points to Applicants who have nonprofit or CDFI Controlling Entities	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.

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4	3/1/2021	NMTC Working Group	Brad Elphick	Application Information	Question 3	Guidance	Clarify if the parent company is considered a Controlling Entity. If CE's track record is not used, should CDE answer "yes" in Q3?	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.
5	3/1/2021	Blooming Ventures LLC	Elaine DiPietro	Application Information	Question 9	Application	Remove "major/minor" urban areas	The CDFI Fund is retaining the current definitions. This information is necessary for publication on the CDFI Fund website.
6	3/1/2021	Blooming Ventures LLC	Elaine DiPietro	Application Information	Question 9	Application	Replace answer option "Real estate financing" with "business primarily engaged in Real Estate Activities" to better align with glossary; move sub-categories from Q10 to Q13(b)	The CDFI Fund is retaining the current definitions. This information is necessary for publication on the CDFI Fund website.
7	3/1/2021	African American Alliance of CDFI CEOs, Chicago Community Loan Fund	Donna Gambrell, Calvin Holmes	Application Instructions	Question 3	Application	Add question "Is the Controlling Entity a Minority Depository Institution?"	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making

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								future policy decisions.
8	3/1/2021	U.S. Bancorp Community Development Corporation (USBCDC), New Markets Tax Credit Coalition, NMTC Working Group, LISC, Enterprise, African American Alliance of CDFI CEOs, Chicago Community Loan Fund, Blooming Ventures	Zachary Boyers, Robert Rapoza, Brad Elphick, Matthew Josephs, Chimeka Gladney, Donna Gambrell, Calvin Holmes, Elaine DiPietro	Application Instructions	CDE Certification Deadline	Review Process	Remove requirement for applicants to be certified as a CDE at the time the NOAA is published.	The CDFI Fund has decided to remove this eligibility requirement and revert to the current process of allowing applicants approximately two weeks after the publication of the NOAA to apply for CDE certification.
9	3/1/2021	NMTC Working Group	Brad Elphick	Business Strategy	Question 18 Due Diligence (New)	Application	Remove "and after" in "a QALICB's ability to remain financially viable and operational during and after the NMTC compliance period."	The CDFI Fund revised this question based on public comments.

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10	3/1/2021	NMTC Working Group	Brad Elphick	Business Strategy	Question 19	Application	Allow at least 2000 character limit per additional innovative use(s) in addition to current 5000 limit	This comment would not reduce burden in completing the NMTC Program Application and is not necessary for the CDFI Fund's evaluation.
11	3/1/2021	NMTC Working Group	Brad Elphick	Business Strategy	Question 20(b)	Application	Clarify third bullet in Q20(b) if the three largest sources of capital on the CE's balance sheet if they deploy non-NMTC loans or would CE be considered one of three largest capital sources of capital?	The CDFI Fund revised this question based on public comments.
12	3/1/2021	NMTC Working Group	Brad Elphick	Community Outcomes	Question 25(a)	Application	Revert commitment of % QLICI to 75%, instead of proposed 85%	The CDFI Fund is retaining the threshold of 85%, as proposed.
13	3/1/2021	NMTC Working Group	Brad Elphick	Community Outcomes	Question 26	Application	Quantify community outcomes on total dollar QEI instead of QLICI	The CDFI Fund revised this question based on public comments.

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14	3/1/2021	NMTC Working Group	Brad Elphick	Community Outcomes	Question 26(a)(2)	Guidance	Clarify whether Applicant can use its own definition or use the application's definition, FAQ#81 states Applicant should clearly define a "Quality Job"	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.
15	3/1/2021	NMTC Working Group	Brad Elphick	Community Outcomes	Question 26(a)(3)	Application	Change "limited language proficiency" to "limited English language proficiency"	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.
16	3/1/2021	NMTC Working Group	Brad Elphick	Community Outcomes	Question 26(a)(5) Community Goods and Services	Application	Remove requirement to provide third party metrics	The CDFI Fund is maintaining the current requirements for this question, which is necessary for the application evaluation.
17	3/1/2021	NMTC Working Group	Brad Elphick	Capitalization Strategy	Question 37(c)	Guidance	Clarify whether percentage of leverage debt anticipated to be sourced from the Investment Fund means only the leverage loan or	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.

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							instead source debt for the leverage loan.	
18	3/1/2021	NMTC Working Group	Brad Elphick	Information Regarding Previous Awards	Question 44	Application	Clarify whether 5th bullet includes any QALICB consultant fees	The CDFI Fund revised this question based on public comments.
19	3/1/2021	NMTC Working Group	Brad Elphick	Exhibits	Table A5	Application	Clarify whether outcome in Table A5 should be selected if Applicant isn't responding to outcomes in Q26	The CDFI Fund revised this question based on public comments.
20	3/1/2021	NMTC Working Group	Brad Elphick	Exhibits	Table D2	Application	Clarify if QLICI loan interest should be reported if it will be collected and distributed to Investment Fund to pay leverage loan interest or report only if it's above what is needed for leverage loan	The CDFI Fund revised this question based on public comments.

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21	3/1/2021	NMTC Working Group	Brad Elphick	Exhibits	Table D2	Application	Increase character limit from 50 to at least 100 for "Description of the Fee"	This comment would not reduce burden in completing the NMTC Program Application and is not necessary for the CDFI Fund's evaluation.
22	3/1/2021	NMTC Working Group	Brad Elphick	Glossary of Terms	Minority-owned or Minority-controlled	Application	Propose edits of definition to expand beyond 51% ownership	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
23	3/1/2021	NMTC Working Group, Self-Help Venture Fund	Brad Elphick, Amanda Frazier Wong	Community Outcomes	Question 26	Application	Add "small business and nonprofit support" as a new community outcome category	This comment would not reduce burden in completing the NMTC Program Application and is not necessary for the CDFI Fund's evaluation.

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24	3/1/2021	Self-Help Venture Fund	Amanda Frazier Wong	General	Phase 1 review	Review Process	Engage NMTC experts and/or CDFI Fund staff to conduct Phase 1 review	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
25	3/1/2021	NMTC Working Group, Blooming Ventures LLC	Brad Elphick, Elaine DiPietro	Business Strategy	Question 20(c), 21(c), 22©	Guidance	Clarify if years requested are years when financing was made, or cumulative years financing has been provided; clarify minimal threshold defined by "has served", if investments occurred in 2018, 2018, 2020, is the answer 3 or 5 years	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.
26	3/1/2021	NMTC Working Group, Blooming Ventures LLC	Brad Elphick, Elaine DiPietro	Management Capacity	Question 34 Fees	Guidance	Clarify instructions so Applicants state what happens to reserve held but not used during compliance period	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.

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27	3/1/2021	NMTC Working Group, National Trust Community Investment Corporation, Blooming Ventures LLC	Brad Elphick, Merrill Hoopengardner, Elaine DiPietro	Exhibits	Table A5	Application	Change "Total QLICs from unaffiliated CDEs" into "Estimated Total QEs from unaffiliated CDEs" under Part J	The CDFI Fund revised this question based on public comments.
28	3/1/2021	Self-Help Venture Fund	Amanda Frazier Wong	General	Phase 1 review	Review Process	Release training procedures and documents to Applicants; clarify how Applicants are assigned; review and analyze whether score variations result from reviewer tendencies; train external reviewers on different types of CDEs applying	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
29	3/1/2021	Self-Help Venture Fund	Amanda Frazier Wong	General	Review Process	Review Process	Review all five sections in Phase 1, or delay scoring and ranking applications until all sections are scored	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.

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30	3/1/2021	Enterprise Community Partner	Chimeka Gladney	Business Strategy	Question 24	Application	Add text to end of 3rd Note: "or providing an equity QLICI"	The CDFI Fund revised this question based on public comments.
31	3/1/2021	Enterprise Community Partner	Chimeka Gladney	Community Outcomes	Question 26	Guidance	Provide examples of "clear and sound" methods and metrics per 3rd note listed under B. Community Outcomes, immediately prior to Q26	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.
32	3/1/2021	Self-Help Venture Fund	Amanda Frazier Wong	General	Phase 2 review	Review Process	Communicate to the Applicant if any point reductions, reordering or other negative action; if allocations not awarded if recommended amount is lower than Applicant's minimum acceptable amount; Selecting Official's decision to reverse or deviate from panel's recommendation	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
33	2/11/2021	Opportunity Fund	Chris Huang	Business Strategy	Question 24	Application	Clarify in 2nd note that "Applicant will be evaluated favorably" in Phase 2	The CDFI Fund revised this question based on public comments.

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34	2/11/2021	Opportunity Fund	Chris Huang	Community Outcomes	Question 26	Review Process	Re-evaluate scoring of Q26 so applicants with the most quantity of outcomes receive the highest scores	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
35	3/1/2021	Self-Help Venture Fund	Amanda Frazier Wong	General	Review Process	Review Process	Include a broader point range to mitigate score clusters	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
36	3/1/2021	NMTC Working Group, Enterprise Community Partners	Brad Elphick, Chimeka Gladney	General	Reporting Requirements	Review Process	Request QEI/QLICI deployment deadline for 2021 round be announced at the same time as 2020 awards; delay QLICI deadline by 6 months due to COVID	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.

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37	3/1/2021	Enterprise Community Partner	Chimeka Gladney	General	Recordings of CDFI Fund presentations	Customer service	Make recordings of CDFI Fund presentations available for all applicants as a reference	The CDFI Fund will consider changes in future application rounds.
38	3/1/2021	PNC Bank	David Gibson	Business Strategy	Question 13(b)	Guidance	Add note and adjust scoring instructions for Phase 1 reviewers to specify that Applicants are not expected to have a track record to invest in or lend to other CDEs	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.
39	3/1/2021	PNC Bank, New Markets Tax Credit Coalition	David Gibson, Robert Rapoza	Business Strategy	Question 19	Application	Modify or create additional "Innovative Investment" type to specify "unrelated minority-owned or minority-controlled or Native American owned or Native American-controlled CDEs that do not have NMTC allocations."	The CDFI Fund added a new Innovative Activity in Q.19 based on public comments.

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40	3/1/2021	Enterprise Community Partner	Chimeka Gladney	General	Application materials	Customer Service	Release FAQs at the same time as the Application	The CDFI Fund will consider changes in future application rounds.
41	3/1/2021	Enterprise Community Partner, Hope Enterprise Corporation, PNC Bank, African American Alliance of CDFI CEO	Chimeka Gladney, Kendra Key, David Gibson, Donna Gambrell,	General	Racial Equity	Review Process	Increase amount of allocation awarded to and managed by minority-owned or controlled CDEs, create a set-aside	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
42	3/1/2021	NAFOA	Dante Desiderio	General	Native Initiative	Review Process	Reduce scores in the next funding round when CDEs do not fulfill commitment in Q19 and Q25	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.

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43	3/1/2021	African American Alliance of CDFI CEOs, Advantage Capital, Chicago Community Loan Fund	Donna Gambrell, Jonathan Goldstein, Calvin Holmes	Glossary of Terms	Minority-Owned or Minority-controlled	Application	Add suggested text to "for-profit" and "not-for-profit entity": "i.e., the daily operations are controlled by and under the direction of designated minority group members."	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
44	2/24/2021	Blooming Ventures LLC	Elaine DiPietro	Exhibits	Table B1	Guidance	Clarify if Row includes other sources for same QALICBs (indirect financing) AND indirect financing provided by the Applicant (non-NMTC), recommend adding 4th row to separate the two	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.
45	2/24/2021	Blooming Ventures LLC	Elaine DiPietro	Exhibits	Table B1	Guidance	Provide guidance for CDEs making business loans/working capital	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.

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46	2/24/2021	Blooming Ventures LLC	Elaine DiPietro	Business Strategy	Question 20(c), 21(c)	Application	Is listing both disadvantaged businesses and disadvantaged communities necessary since the definition changed	The CDFI Fund revised this definition based on public comments.
47	3/1/2021	Blooming Ventures LLC	Elaine DiPietro	Exhibits	Table D2	Application	Update wording to "upfront fee" charged "before or at the time of QLICI closing or QEI funding"	The CDFI Fund revised this question based on public comments.
48	3/1/2021	Blooming Ventures LLC	Elaine DiPietro	Exhibits	Table D2	Guidance	Clarify whether expenses for application writer or other consultants count as expenses under Table D2, part 3(d)	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.
49	3/1/2021	Blooming Ventures LLC	Elaine DiPietro	Exhibits	Table D2	Guidance	Clarify if the same table can be used for multiple financial products if they use the same fee structure	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.

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50	3/1/2021	Blooming Ventures LLC	Elaine DiPietro	Management Capacity	Question 34 Fees	Application	Clarify if fees include interest income to the extent it's retained by CDE for "ongoing fee", not that CDE include both interest income and "expense" of distribution to the investor	The CDFI Fund revised this question based on public comments.
51	3/1/2021	NAFOA	Dante Desiderio	General	Native Initiative	Application	Give Applicants extra credit for partnering with organizations that primarily serve Indian Country	The CDFI Fund added a new Innovative Activity in Q.19 based on public comments.
52	3/1/2021	NAFOA	Dante Desiderio	General	Native Initiative	Review Process	Utilize reviewers that understand challenges of and capabilities investing in tribal communities	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
53	3/1/2021	Blooming Ventures LLC	Elaine DiPietro	Business Strategy	Question 20(b)	Application	Remove second bullet, instead add a chart showing Applicant's direct/indirect financing	The CDFI Fund will consider changes in future application rounds.

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54	3/1/2021	Blooming Ventures LLC	Elaine DiPietro	Business Strategy	Question 20(b)	Guidance	Clarify in application, instead of FAQ, if an Applicant can discuss their full track record or only 5 yrs in Exhibit B, recommend last 7 yrs	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.
55	3/1/2021	Blooming Ventures LLC	Elaine DiPietro	Business Strategy	Question 21 or 22€	Application	Remove "Restricted NMTC Activities" from Q21 since the heading for Table B4 was changed	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.
56	3/1/2021	Blooming Ventures LLC	Elaine DiPietro	Business Strategy	Question 20(b)	Application	Clarify why "or" in 4th bullet is emphasized	The CDFI Fund revised this question based on public comments.
57	3/1/2021	Blooming Ventures	Elaine DiPietro	Business Strategy	Question 14	Application	Change question to focus on the flexible/more favorable market terms are important, or how the two impacts the QALICB, product description would be required only if it's not common A/B loan structure	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.

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58	3/1/2021	Blooming Ventures LLC	Elaine DiPietro	FAQ	FAQ #86	Guidance	Clarify what should be included when discussing impact from portion of the project financed by QLICI	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.
59	3/1/2021	Blooming Ventures LLC	Elaine DiPietro	FAQ	FAQ #6	Guidance	Correct reference from Q30(c) to Q30(d) since it relates to Table D1	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.
60	3/1/2021	Blooming Ventures LLC	Elaine DiPietro	Business Strategy	Question 17(d)	Guidance	Clarify if CDFI Fund has preference for CDEs to specialize by project type, geography, etc to inform investment strategies	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.
61	3/1/2021	African American Alliance of CDFI CEOs, Chicago Community Loan Fund, National Bankers Association	Donna Gambrell, Calvin Holmes, Robert James II,	General	Emerging CDEs	Review Process	Preserve at least 40% allocation for "Emerging Qualified CDEs", add definition to glossary (<\$150M assets, <=five allocations), add provisions for Applicants to self-	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making

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							identify as "Emerging Qualified CDE", add instructions in Q2, compete against other "Emerging Qualified CDEs" in its own pool	future policy decisions.
62	3/1/2021	African American Alliance of CDFI CEOs, Chicago Community Loan Fund, National Bankers Association	Donna Gambrell, Calvin Holmes, Robert James II,	General	Review Process	Review Process	Amend scoring process that favor larger more tenured Applicants, where less tenured "Emerging CDEs"	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
63	3/1/2021	Blooming Ventures	Elaine DiPietro	General	Allocation Agreement	IT Enhancement	Provide alternatives to hardcopy signatures from Controlling Entity Authorized Representatives	The CDFI Fund will consider additional enhancements to AMIS functionality in future application rounds.

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64	3/1/2021	Blooming Ventures LLC	Elaine DiPietro	Business Strategy	Question 17(c)	Application	Change answer format to a chart including: total # of businesses/CDEs, total QEI/QLICI financing to be provided by applicant, % of category for business types, % of activity types	The CDFI Fund will consider changes in future application rounds.
65	3/1/2021	Blooming Ventures LLC	Elaine DiPietro	Business Strategy	Question 17	Application	In 3rd note immediately prior to Q17, clarify if "clearly consistent" with business strategy related to business types or overall strategy of community outcomes	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.
66	3/1/2021	Blooming Ventures LLC	Elaine DiPietro	Exhibits	Table A1-A4	Application	Clarify whether the table asks for QEIs or QLICIs, recommend QEI so it's consistent with Q1	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.

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67	3/1/2021	Blooming Ventures LLC	Elaine DiPietro	Exhibits	Table A5	Guidance	Clarify language for Part A where "links to narrative description in Q17" contradicts FAQ specifying not including detailed project descriptions in Q17	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.
68	3/1/2021	Blooming Ventures LLC	Elaine DiPietro	Exhibits	Table A5	Guidance	Provide guidance for Part B where small deal/revolving loan fund are in multiple locations	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.
69	3/1/2021	Blooming Ventures LLC	Elaine DiPietro	Exhibits	Table A5	Guidance	Provide guidance for Part C for census tract where location has not been determined	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.
70	3/1/2021	Blooming Ventures LLC	Elaine DiPietro	Capitalization Strategy	Question 38	Guidance	Clarify what's meant by investors identifying transactions or if there's a min threshold that would or would not be considered investor "originating or	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.

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							otherwise identifying" transactions	
71	3/1/2021	Blooming Ventures LLC	Elaine DiPietro	Capitalization Strategy	Question 39	Guidance	Clarify whether a CDE that receives a QEI funded in part with leverage from an affiliate should select "yes"	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.
72	3/1/2021	Blooming Ventures LLC	Elaine DiPietro	Exhibits	Table A5	Application	Remove Part I since all applicants must answer "investment in QALICB"	The CDFI Fund revised this question based on public comments.
73	3/1/2021	Blooming Ventures LLC	Elaine DiPietro	Information Regarding Previous Awards	Question 44(e)	Application	Move Q24 to Part III or IV, or combine Q24 with Q44(e)	This comment would not reduce burden in completing the NMTC Program Application and is not necessary for the CDFI Fund's evaluation.
74	3/1/2021	Blooming Ventures LLC	Elaine DiPietro	Information Regarding Previous Awards	Question 45	Guidance	Edit wording since allocatee must retain control of the CDE/sub-CDE	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.

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75	3/1/2021	Blooming Ventures LLC	Elaine DiPietro	Information Regarding Previous Awards	Question 45	IT Enhancement	Reduce burden by saving info year to year or reported out of AMIS	The CDFI Fund will consider additional enhancements to AMIS functionality in future application rounds.
76	3/1/2021	Blooming Ventures LLC	Elaine DiPietro	Information Regarding Previous Awards	Question 44(b)	Application	Combine this question with other questions about co-investing or remove question	The CDFI Fund revised this question based on public comments.
77	3/1/2021	Blooming Ventures LLC	Elaine DiPietro	Exhibits	Table C1/C2	Guidance	Should board members be listed in both charts if they provide management support	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.
78	3/1/2021	Blooming Ventures LLC	Elaine DiPietro	Exhibits	Table C2	Application	Where should applicant discuss application writer?	This information may be collected in the "other" option in Table C2

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79	3/1/2021	Blooming Ventures LLC	Elaine DiPietro	Exhibits	Table C1/C2	Review Process	Allow Applicant to have more options in being accountable to LICs	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
80	3/1/2021	Blooming Ventures LLC	Elaine DiPietro	Exhibits	Table C1/C2	Guidance	Should Applicant notify the CDFI Fund if board members change since the submission of the Application	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.
81	3/1/2021	Blooming Ventures LLC	Elaine DiPietro	Exhibits	Table C2	Application	Add "application consultant" under "type of activity", add "asset manager" under "position with applicant"	This information may be collected in the "other" option in Table C2

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82	3/1/2021	Blooming Ventures LLC	Elaine DiPietro	Exhibits	Table A5	Guidance	Clarify definition of mixed-use real estate as multiple uses in one building like mixed tenants, or commercial/residential under Part N	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.
83	3/1/2021	Blooming Ventures LLC	Elaine DiPietro	Exhibits	Table A5	Guidance	Clarify if food related business fall under "retail" in Part N	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.
84	3/1/2021	Blooming Ventures LLC	Elaine DiPietro	Business Strategy	Question 17	Guidance	In 4th note immediately prior to Q17, clarify if guidance for "Small Dollar/Revolving Loan Fund" applies to all scenarios of small dollar QLICs, revolving loan funds, and combo of both	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.

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85	3/1/2021	Blooming Ventures LLC	Elaine DiPietro	Management Capacity	General	Guidance	Clarify dates and time frames for question and tables (app release date in Q30(d) vs tables with FYE, Q30e pertain to Applicant's entire operating history or within past 3 years	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.
86	3/1/2021	Blooming Ventures LLC	Elaine DiPietro	Community Outcomes	Question 26	Guidance	In part A of 3rd note, "quantities" should be explained and compared to the track record but not expected to be consistent	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.
87	3/1/2021	Blooming Ventures LLC	Elaine DiPietro	Community Outcomes	Question 26	Guidance	Incorporate guidance from FAQ on how to provide info with other CDEs/multi-CDE investments; how info ties back to Exhibit B	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.
88	3/1/2021	Blooming Ventures LLC	Elaine DiPietro	Community Outcomes	Question 26	Guidance	Clarify how impact from small loans/revolving loan funds are discussed when investments are not identified	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.

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89	3/1/2021	Blooming Ventures LLC	Elaine DiPietro	Community Outcomes	Question 26	Guidance	Provide guidance on how metrics are assessed, if metrics are just reported, or should be analyzed to support quantity and/or quality of outcomes	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.
90	3/1/2021	Blooming Ventures LLC	Elaine DiPietro	Community Outcomes	Question 26(a)(1), 26(a)(2), 26(a)(3)	Application	Combine three job categories with higher character limit	The CDFI Fund is maintaining the current requirements for this question, which is necessary for the application evaluation.
91	3/1/2021	Blooming Ventures LLC	Elaine DiPietro	Business Strategy	Question 24	Application	Clarify how the info is used since the first note states it is not used to consider whether an Applicant is scored highly enough for allocation	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.
92	3/1/2021	Blooming Ventures LLC	Elaine DiPietro	Business Strategy	Question 24	Guidance	In 3rd note, provide guidance for CDFIs or lenders that may make loans to the same or affiliate borrowers through affiliates of Applicant in normal course of business	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
93	3/1/2021	U.S. Bancorp Community Development Corporation (USBCDC), New Markets Tax Credit Coalition, NMTC Working Group, Enterprise Community Partners, African American Alliance of CDFI CEOs, Chicago Community Loan Fund, National Bankers Association	Zachary Boyers, Robert Rapoza, Brad Elphick, Chimeka Gladney, Donna Gambrell, Calvin Holmes, Robert James II	Business Strategy	Question 20 and 21	Review Process	Remove restriction to discuss experience of individual(s) who worked with Disadvantaged Businesses or Disadvantaged Communities to establish track record	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
94	3/1/2021	Michigan Community Capital, OFN, Forward Community Investments, Cinnaire	Eric Hanna, Mary Scott Hardwick, Tracy Hubbard, Peter Giles	General	Review Process	Review Process	Add a fee-related question to the Business Strategy for Phase 1 review, incorporate weighting of fee-related responses prior to final ranking of applicants for awards	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
95	3/1/2021	Michigan Community Capital, New Markets Tax Credit Coalition, OFN, NMTC Working Group,	Eric Hanna, Robert Rapoza, Mary Scott Hardwick, Chris Huang, Brad Elphick	Business Strategy	Question 17(c)	Application	Restore bullet to the instructions: "The Applicant's strategy for identifying potential borrowers, investees, or other customers in Low-Income Communities"	This comment would not reduce burden in completing the NMTC Program Application and is not necessary for the CDFI Fund's evaluation.
96	3/1/2021	Michigan Community Capital, New Markets Tax Credit Coalition. OFN, Opportunity Fund, NMTC Working Group, LISC, Craft3, SZ Consulting, National Trust Community Investment Corporation, Florida Community Loan Fund, Blooming Venture LLC	Eric Hanna, Robert Rapoza, Mary Scott Hardwick, Chris Huang, Brad Elphick, Matthew Josephs, Maggie Kirby Weiland, Sean Zielenbach, Merrill Hoopengardner, Ignacio Esteban, Elaine DiPietro	Business Strategy	Question 18 Due Diligence (New)	Application	Remove Question 18 and incorporate forward-looking question to Question 29(c), Q29(a) or 28(b)	The CDFI Fund revised this question based on public comments.

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
97	2/23/2021	Michigan Community Capital, Forward Community Investments, Cinnaire	Eric Hanna, Tracy Hubbard, Peter Giles	FAQ	FAQ #106	Guidance	Update FAQ #106 to report required donations by QALICB	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.
98	2/23/2021	Michigan Community Capital, Forward Community Investments, Cinnaire	Eric Hanna, Tracy Hubbard, Peter Giles	Management Capacity	Question 34 Fees	Regulation	Require all applicants charge upfront fees at the sub-CDE or QALICB instead of at the Investment Fund level	This comment is related to IRS regulations. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
99	3/1/2021	Blooming Ventures LLC	Elaine DiPietro	General	Phase 1 Review	Review Process	Move questions not scored in Phase 1 to later sections (i.e. Q19, Q21, Q24, etc)	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
100	3/1/2021	Native CDFI Network	Jackson Brossy	General	Native Initiative	Review Process	Establish a NMTC Native American program	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
								raised in making future policy decisions.
101	3/1/2021	Native CDFI Network	Jackson Brossy	General	Native Initiative	Regulation	Clearly state that a tribal government can own a QALICB	This comment is related to IRS regulations. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
102	3/1/2021	Advantage Capital	Jonathan Goldstein	Glossary of Terms	Minority-Owned or Minority-controlled	Application	Add suggested text to "for-profit" and "not-for-profit entity": 30% ownership	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
103	3/1/2021	Community Development Bankers Association	Jeannine Jacokes	Management Capacity	Question 29(c)	Application	Remove Question 29(c) which duplicates Question 18	The CDFI Fund revised this question based on public comments.

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
104	3/1/2021	Community Development Bankers Association	Jeannine Jacokes	Management Capacity	Question 29, 30, 31	Application	Remove requirement to estimate percentages of work to be performed by consultants, staff and/or board member	The CDFI Fund is maintaining the current requirements for this question, which is necessary for the application evaluation.
105	3/1/2021	Community Development Bankers Association	Jeannine Jacokes	Community Outcomes	Question 25(a)	Application	Support increasing commitment to areas of higher distress from 75% to 85%	The CDFI Fund is retaining the threshold of 85%, as proposed.
106	3/1/2021	Native CDFI Network	Jackson Brossy	General	Native Initiative	Review Process	Provide same access to allocations to groups offering smaller loans afforded to those making larger loans	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
107	3/1/2021	Community Development Bankers Association, SZ Consulting	Jeannine Jacokes, Sean Zielenbach	Business Strategy	Question 20(b) and 21(c)	Application	Revise fourth bullet of Q20(b) and 21(c) to require discussion experience of both Applicant and Controlling Entity in serving DBCs	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
108	3/1/2021	Community Development Bankers Association	Jeannine Jacokes	General	Regulated Entities	Guidance	Discuss NMTC eligibility considerations so regulated banks and credit unions can make informed decision about applying	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.
109	3/1/2021	Community Development Bankers Association, NMTC Working Group, Craft3, SZ Consulting,	Jeannine Jacokes, Brad Elphick, Maggie Kirby Weiland, Sean Zielenbach,	Community Outcomes	Question 26(a)(2) and 26(a)(3)	Guidance	Limit required description of quality and accessibility of jobs to permanent positions only, description of temporary positions should be optional	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.
110	3/1/2021	Community Development Bankers Association, NMTC Working Group, LISC, Self-Help Venture Fund, Enterprise Community Partners, Renaissance Community Loan Fund, National Trust Community	Jeannine Jacokes, Brad Elphick, Matthew Josephs, Amanda Frazier Wong, Chimeka Gladney, Kimberly LaRosa, Merrill Hoopengardner, Elaine DiPetro	Post Award		Customer service	Increase transparency of post-award feedback with details of scores and reviewers' comments, the CDFI Fund's priorities; prove exact scores, score broken down by section, overall rankings, number of priority points earned, the score cut-off, scores given by each reviewer to all applicants;	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
		Investment Corporation, Blooming Ventures LLC					provide debriefings to all applicants	
111	3/1/2021	Community Development Bankers Association, Michigan Community Capital, Craft3, SZ Consulting	Jeannine Jacokes, Eric Hanna, Maggie Kirby Weiland, Sean Zielenbach	Community Outcomes	Question 26(a)(7)	Application	Expand question from minority/Native to all black, Indigenous, and People of Color into a single question	The CDFI Fund will use the definitions as proposed and cited to the Office of Management and Budget and the Bureau of Indian Affairs.
112	3/1/2021	Community Development Bankers Association, Self-Help Venture Fund, SZ Consulting	Jeannine Jacokes, Amanda Frazier Wong, Sean Zielenbach	General	Lower Allocation Amounts	Review Process	Award allocations to all CDEs that score in the highest tier by lowering allocation awards	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
113	3/1/2021	Community Development Bankers Association, Craft3, SZ Consulting	Jeannine Jacokes, Maggie Kirby Weiland, Sean Zielenbach	Business Strategy	Question 17(c)	Application	Clarify question by asking Applicants to discuss its social investment criteria, provide guidance and make sure there's sufficient character limits	The CDFI Fund revised Question 12 based on public comments.

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
114	3/1/2021	Community Development Bankers Association, LISC, SZ Consulting, Blooming Ventures LLC	Jeannine Jacokes, Matthew Josephs, Sean Zielenbach, Elaine DiPietro	Business Strategy	Question 20(b)	Application	Delete third bullet in Q20(b), instead request this information by narrowing focus of Q14(b) or check back in Table B1	The CDFI Fund revised this question based on public comments.
115	3/1/2021	Community Development Bankers Association, SZ Consulting	Jeannine Jacokes, Sean Zielenbach	Information Regarding Previous Awards	Question 44	Application	Adding table for essential info: description of projects, its need for NMTCs, size of allocation, projects' impact to date, QEI and QLICI amounts, fees and source of leverage debt	The CDFI Fund will consider changes in future application rounds.
116	3/1/2021	Community Development Bankers Association, SZ Consulting,	Jeannine Jacokes, Sean Zielenbach	Community Outcomes	Add new question	Application	Add question on an Applicant's overall community development strategy and how NMTC fit into that plan.	The CDFI Fund revised Question 12 based on public comments.

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
117	3/1/2021	Community Development Bankers Association, SZ Consulting,	Jeannine Jacokes, Sean Zielenbach	Community Outcomes	Question 26(a)(2)	Application	Amend definition of quality jobs to those with a living wage and employment benefits, instead of current definition of "and/or"	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
118	3/1/2021	Community Development Bankers Association, SZ Consulting,	Jeannine Jacokes, Sean Zielenbach	Business Strategy		Review Process	Edit the application and review process to focus on QALCB types and characteristics, instead of pipeline projects	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
119	3/1/2021	Community Development Bankers Association, SZ Consulting,	Jeannine Jacokes, Sean Zielenbach	Business Strategy	Question 18	Application	Revise second bullet to permit new Applicants to discuss due diligence for non-NMTC projects	The CDFI Fund revised this question based on public comments.

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
120	3/1/2021	Community Development Bankers Association, SZ Consulting, Craft3	Jeannine Jacokes, Sean Zielenbach, Maggie Kirby Weiland	General		Customer service	Recommend CDFI Fund publish an analysis of fees currently being charged for greater transparency allowing applicants to benchmark themselves	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.
121	3/1/2021	Community Development Bankers Association, Craft3	Jeannine Jacokes. Maggie Kirby Weiland	Community Outcomes	Question 26(a)(3)	Application	Amend definition of accessible jobs as "and/or" instead of current definition of "and"	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
122	3/1/2021	Corporation for Supportive Housing	Jill Steen	Community Outcomes	Question 26(a)(8) Housing	Application	Permit applicants to discuss Low Income Housing Tax Credits financing housing where NMTCs finance the commercial portion	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.
123	3/1/2021	Advantage Capital	Jonathan Goldstein	Business Strategy	General	Review Process	Ensure reviews emphasize track record over pipeline projects	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
								evaluate the issues raised in making future policy decisions.
124	3/1/2021	Advantage Capital	Jonathan Goldstein	Business Strategy	Question 19	Application	Restore question about "how CDEs were increasing volume of investments, taking more risk and pursuing innovative strategies"	This comment would not reduce burden in completing the NMTC Program Application and is not necessary for the CDFI Fund's evaluation.
125	3/1/2021	Advantage Capital	Jonathan Goldstein	Business Strategy	Question 19	Application	Add "use (or non-use) of affiliate leverage" as an innovative activity	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
126	3/1/2021	Community Development Bankers Association, Hope Enterprise Corporation, SZ Consulting	Jeannine Jacokes, Kendra Kay, Sean Zielenbach	General	Caps on allocation awards	Review Process	Institute a 3 yr \$150/200M cap for any applicant	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
127	3/1/2021	Advantage Capital	Jonathan Goldstein	General	CDE Certification Deadline	Review Process	Have a fixed deadline for CDE certification Applications for new CDE Applicants	The CDFI Fund has decided to remove this eligibility requirement and revert to the current process of allowing applicants approximately two weeks after the publication of the NOAA to apply for CDE certification.
128	2/24/2021	City First Bank, SZ Consulting, Advantage Capital, Confederated Tribes of the Colville Reservation, Confederated Tribes of the Chehalis Reservation	Kahlil Gross, Sean Zielenbach, Jonathan Goldstein, Rodney Cawston, Harry Pickernell	Glossary of Terms	Disadvantaged Business	Application	Add "(c) a Minority-owned or controlled business or nonprofit" to the definition of a "Disadvantaged Business" add veterans, ex-offenders, or businesses located in non-metro census tracts	The CDFI Fund revised this question based on public comments.
129	3/1/2021	Advantage Capital	Jonathan Goldstein	General	Phase 1 review	Review Process	Use external reviewers to determine "qualified" and "unqualified" applicants instead of using their review to determine scoring rank	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
								future policy decisions.
130	3/1/2021	Hope Enterprise Corporation	Kendra Key	General	Minority-Owned or Minority-controlled	Review Process	Conduct an in-depth assessment of application and scoring to identify areas where racial disparities may be perpetuated	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
131	3/1/2021	Hope Enterprise Corporation	Kendra Key	General	Minority-Owned or Minority-controlled	Review Process	Create incentives for experienced CDEs to work with new and/or Minority-led CDEs to gain experience	The CDFI Fund added a new Innovative Activity in Q.19 based on public comments.
132	3/1/2021	Homeownership Alliance	Kristin Siglin	Community Outcomes	Question 26	Review Process	Allow for documentation of broader impacts on neighborhoods	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
133	3/1/2021	Hope Enterprise Corporation	Kendra Key	General	Minority-Owned or Minority-controlled	Customer service	Provide public data on Minority-led CDE certifications, awards, and applicants	The CDFI Fund will consider changes in future application rounds.
134	3/1/2021	Homeownership Alliance	Kristin Siglin	General	Definition of "affordable" home sales	Guidance	Make sure NMTC guidance stays attuned to Qualified Mortgages as FHA and CFPB's policy evolves	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.
135	3/1/2021	Homeownership Alliance	Kristin Siglin	AMIS	Data	Reporting and Compliance	Provide a data point to document final corrected home developed and sold to low income people	This comment is related to Allocatee reporting/compliance and will be considered in the future.
136	3/1/2021	Homeownership Alliance	Kristin Siglin	AMIS	Data	Reporting and Compliance	Enable the user the ability to change home addresses	This comment is related to Allocatee reporting/compliance and will be considered in the future.

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
137	3/1/2021	Homeownership Alliance	Kristin Siglin	General	Rule when QALICB don't know or don't control Homebuyer's debt to income ratio	Reporting and Compliance	Lower requirements of home sales price 95% of HUD area median sales price	This comment is related to Allocattee reporting/compliance and will be considered in the future.
138	3/1/2021	Craft3	Maggie Kirby Weiland	General	Application materials	Application	Provide clear guidance within application (or separate document) assuming the CDFI Fund is proposing to remove "tips" from instructions	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.
139	3/1/2021	Craft3	Maggie Kirby Weiland	General	Question 24	Application	Support moving Q24 from Phase 1 to Phase 2 Review Process	The CDFI Fund revised this question based on public comments.
140	3/1/2021	OFN	Mary Scott Hardwick	General	Priority Points	Review Process	Add priority points for applicants demonstrating accountability to LICs	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
								future policy decisions.
141	3/1/2021	OFN	Mary Scott Hardwick	General	Certification	CDE Certification	Require NMTC Advisory Boards to equitably represent the communities that CDEs serve	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
142	3/1/2021	OFN, Forward Community Investments	Mary Scott Hardwick, Tracy Hubbard	General	Minority-Owned or Minority-controlled	Review Process	Create permanent ongoing TA with annual funding for training and TA grants for new and emerging minority-controlled CDEs	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
143	3/1/2021	LISC	Matthew Josephs	Capitalization Strategy	Question 39	Application	Move Q39 Distribution of Benefits from Part IV to Part I; score a CDE's ability to provide majority of benefits in Phase 1; revise question so Applicants disclose total benefits they receive from transactions	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
144	3/1/2021	LISC	Matthew Josephs	Capitalization Strategy	Question 40	Application	Add a question where CDE commits to a max all-in fee, move Q40 to Part III replacing Q34	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
145	3/1/2021	LISC, Chicago Community Loan Fund	Matthew Josephs, Calvin Holmes	Business Strategy	Question 14	Application	Add Yes/No sub-question if CDE intends to provide a debt product using a leveraged structure, if yes Applicants are only required to describe its rates and terms not product	The CDFI Fund is maintaining the current requirements for this question, which is necessary for the application
146	3/1/2021	LISC, Chicago Community Loan Fund	Matthew Josephs, Calvin Holmes	Business Strategy	Question 20 and 21	Review Process	Bifurcate each question's 5 priority points into 3 for Applicant's track record, and 2 for Controlling Entity/parent company	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
147	3/1/2021	LISC, National Trust Community Investment Corporation	Matthew Josephs, Merrill Hoopengardner	Management Capacity	Question 30(d), 30(e)	Application	Responses would not be required for CDEs with delinquency rate less than 5% or total write-off less than 3%	The CDFI Fund is maintaining the current requirements for this question, which is necessary for the application
148	3/1/2021	LISC, National Trust Community Investment Corporation	Matthew Josephs, Merrill Hoopengardner	Management Capacity, Capitalization Strategy	Question 29(a), 30(a), 30(c), 31(a), 31(b), Q35, Q37	Application	Responses would not be required for "established" CDEs with no significant changes in personnel or policy	The CDFI Fund is maintaining the current requirements for this question, which is necessary for the application
149	3/1/2021	OFN, Forward Community Investments, Cinaire, Michigan Community Capital	Mary Scott Hardwick, Tracy Hubbard, Peter Giles, Eric Hanna	General	Controlling Entity	Review Process	Add question to discuss mission focus of Controlling Entities into Phase 1 review, give preference to mission-driven orgs	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
150	3/1/2021	LISC, National Bankers Association	Matthew Josephs, Robert James II	General	CDEs partnering as Applicants	Review Process	Allow new CDEs to partner with "established" CDEs by hiring CDEs are service providers, commit to co-invest; allow new CDEs to utilize their partnering CDEs' track	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
							record for priority points	future policy decisions.
151	3/1/2021	National Trust Community Investment Corporation	Merrill Hoopengardner	Community Outcomes	Question 26	Guidance	Provide transparency about how methods and metrics are evaluated	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.
152	3/1/2021	National Trust Community Investment Corporation	Merrill Hoopengardner	Management Capacity	Question 29(c)	Application	Increase character limit from 2000 to 3000	This comment would not reduce burden in completing the NMTC Program Application and is not necessary for the CDFI Fund's evaluation.
153	3/1/2021	Kandiyo Consulting; Brownfield Revitalization, LLC; Scarlet Oak Capital Impact; (no affiliation); Community Development Bankers Association; New Markets Tax Credit Coalition, OFN,	Michael Krause, Bret Batchelder, Rohit Kejriwal, John Mazzarino, Jeannine Jacokes, Robert Rapoza, Mary Scott Hardwick, Brad Elphick, Amanda Frazier Wong, Chimeka Gladney, Maggie Kirby Weiland, Sean	Community Outcomes	former Question 25(a)(10) Environmentally Sustainable Outcomes	Application	Restore Environmentally Sustainable Outcomes in evaluating NMTC projects and applications; simplify to focus on benefits for LICs; add storm water mgmt.	Revised based on public comments. The CDFI Fund has reverted to the previous Environmentally Sustainable Outcomes question and will consider additional guidance.

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
		NMTC Working Group, Self-Help Venture Fund, Enterprise Community Partners, Craft3, SZ Consulting, National Trust Community Investment Corporation,	Zielenbach, Merrill Hoopengardner					
154	3/1/2021	Maya CDE, Rose Urban Green Fund, Michigan Community Capital, Mid-City Community CDE, OFN, Popular Community Development	Moctesuma Esparza, Jonathan Rose, Eric Hanna, Lois Fried, Scott Hardwick, Natalia Guzman	Community Outcomes	Question 26(a)(6) Financing Minority Businesses	Guidance	Add to guidance and FAQ to include investments into or loans purchases from Minority CDEs, and number of minority residents served or employed, tenants that are minority-owned or controlled	The CDFI Fund revised this question based on public comments.
155	3/1/2021	Maya CDE. Rose Urban Green Fund, Community Development Bankers Association, New , Popular Community Development Markets Tax	Moctesuma Esparza, Jonathan Rose, Jeannine Jacokes, Robert Rapoza, Mary Scott Hardwick, Anna Bovaird Nevins, Maggie Kirby Weiland, Sean	Community Outcomes	former Question 27 "Additional Investment"	Application	Restore question on "Additional Investment" with extended track record over 7 to 10 year period, make the question optional, discuss examples but not accept IMPLAN estimates for this question, or create	This comment would not reduce burden in completing the NMTC Program Application and is not necessary for the CDFI Fund's evaluation.

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
		Credit Coalition, PIDC Community Capital, Craft3, SZ Consulting, Mid-City Community CDE, National Trust Community Investment Corporation	Zielenbach, Lois Fried, Natalia Guzman, Merrill Hoopengardner				"Additional Investment" outcome in Q26(a)	
156	3/1/2021	Maya CDE. Rose Urban Green Fund, Community Development Bankers Association, New Markets Tax Credit , Popular Community Development Coalition, OFN, LISC, PIDC Community Capital, Enterprise Community Partners, Mid-City Community	Moctesuma Esparza, Jonathan Rose, Jeannine Jacokes, Robert Rapoza, Mary Scott Hardwick, Matthew Josephs, Anna Bovaird Nevins, Chimeka Gladney, Lois Fried, Natalia Guzman, Merrill Hoopengardner, Elaine DiPietro	Business Strategy	Question 17(d)	Application	Eliminate this question or add guidance or FAQ question to clarify an Applicant's participation in multi CDE transactions will not affect their likelihood of securing an award	The CDFI Fund revised this question based on public comments.

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
		CDE, National Trust Community Investment Corporation, Blooming Ventures LLC						
157	3/1/2021	Maya CDE. Rose Urban Green Fund, Mid-City Community CDE	Moctesuma Esparza, Jonathan Rose, Lois Fried	FAQ	FAQ #53	Guidance	Clarify FAQ #53 to eliminate the restriction on Applicants that receive investment or loans from other CDEs that disallows Applicants from applying for a NMTC award; and the restriction on Applicants from investing in, lending to, or purchasing loans from a CDE if that CDE has received a NMTC award in the last 3-years.	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
158	3/1/2021	Maya CDE, Rose Urban Green Fund, Mid-City Community CDE, Popular Community Development	Moctesuma Esparza, Jonathan Rose, Lois Fried, Natalia Guzman	Community Outcomes	new outcome under Question 26(a) Women-owned or controlled businesses	Application	Add a new outcome similar to "Financing Minority Businesses" for "Financing Women-Owned or Controlled Businesses"	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
159	3/1/2021	Maya CDE, Rose Urban Green Fund, Mid-City Community CDE, Popular Community Development	Moctesuma Esparza, Jonathan Rose, Lois Fried, Natalia Guzman	Business Strategy	Question 20 and Exhibit B Business Strategy	Application	Add a standalone table to capture Financial Counseling and Other Services (FCOS)	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
160	3/1/2021	Maya CDE, Rose Urban Green Fund, Mid-City Community CDE, Popular Community Capital, PNC Bank	Moctesuma Esparza, Jonathan Rose, Lois Fried, Natalia Guzman, David Gibson	Business Strategy	Question 19	Application	Update the Innovative Investments question to include as innovative activities investments, loans to, or purchases of loans from CDEs/Minority-owned CDEs/Native-owned CDEs	The CDFI Fund added a new Innovative Activity in Q.19 based on public comments.

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
161	3/1/2021	Maya CDE, Rose Urban Green Fund, Scarlet Oak Capital Impact, New Markets Tax Credit Coalition, NMTC Working Group, PIDC Community Capital, Enterprise Community Partners, Mid-City Community CDE, National Trust Community Investment Corporation, Florida Community Loan Fund	Moctesuma Esparza, Jonathan Rose, Rohit Kejriwal, Robert Rapoza, Brad Elphick, Anna Bovaird Nevins, Chimeka Gladney, Lois Fried, Natalia Guzman, Merrill Hoopengardner, Ignacio Esteban	Community Outcomes	former Question 25(a)(8) Flexible Lease Rates Outcomes	Application	Restore question on "Flexible Lease Rates"; expand outcome to other flexible criteria such as lower security deposit, landlord paid improvements, more flexible lease terms, etc	The CDFI Fund made revisions to Question 26(a)(4) and Question 26(a)(5) to ensure lower rents to tenant businesses may be described and evaluated with other similar outcomes.
162	3/1/2021	Maya CDE, Rose Urban Green Fund, U.S. Bancorp Community Development Corporation (USBCDC), Travois, NMTC	Moctesuma Esparza, Jonathan Rose, Zachary Boyers, Phil Glynn, Brad Elphick, Matthew Josephs, Anna Bovaird Nevins,	Glossary of Terms	Disadvantaged Business	Application	Restore "(c) a business that has inadequate access to investment capital" to the definition of a "Disadvantaged Business"	The CDFI Fund revised this definition based on public comments.

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
		Working Group, LISC, PIDC Community Capital, Enterprise Community Partners, Mid- City Community CDE, Popular Community Development, African American Alliance of CDFI CEOs, Advantage Capital, Confederated Tribes of the Colville Reservation, Confederated Tribes of the Chehalis Reservation, Chicago Community Loan Fund	Chimeka Gladney, Lois Fried, Natalia Guzman, Donna Gambrell, Jonathan Goldstein, Rodney Cawston, Harry Pickernell, Calvin Holmes					

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
163	3/1/2021	Maya CDE, Mid-City Community CDE, Popular Community Development	Moctesuma Esparza, Lois Fried, Natalia Guzman	Business Strategy	Section C Prior Performance	Review Process	Expand the first Note in "Section C. Prior Performance" to add that during the evaluation period certain non-QLICI like direct track record in Table B4 is evaluated and scored the same as an Applicant's direct track record of investments included in Table B1	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
164	2/16/2021	BrightBridge Capital	Monica Blanton	AMIS	Data	Reporting and Compliance	If an SPE was set up for NMTC structure purposes and is renting back to an operating business, should this be the SPE date or operating business date?	This comment is related to Allocatee reporting/compliance and will be considered in the future.
165	2/16/2021	BrightBridge Capital	Monica Blanton	AMIS	Data	Reporting and Compliance	Report all project impact, not just by project type	This comment is related to Allocatee reporting/compliance and will be considered in the future.

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
166	2/16/2021	BrightBridge Capital	Monica Blanton	AMIS	Data	Reporting and Compliance	Eliminate loan loss reserve data point	This comment is related to Allocatee reporting/compliance and will be considered in the future.
167	2/16/2021	BrightBridge Capital	Monica Blanton	AMIS	Data	Reporting and Compliance	Can AMIS auto fill some geographic data points (ie poverty rate, unemployment, non-metro, etc)?	This comment is related to Allocatee reporting/compliance and will be considered in the future.
168	3/1/2021	National Trust Community Investment Corporation	Merrill Hoopengardner	General		Review Process	Require all Applicants to submit Part I and II, only Applicants that move onto Phase 2 will submit the remainder of the Application	The CDFI Fund is maintaining the current requirements for this question, which is necessary for the application evaluation.
169	2/16/2021	BrightBridge Capital	Monica Blanton	CIMS4		Reporting and Compliance	Flag for specific address must be placed manually	This comment is related to the CDFI Fund mapping system and will be considered in the future.

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
170	2/16/2021	BrightBridge Capital	Monica Blanton	CIMS4		Reporting and Compliance	Not able to print the distress or qualifying characteristics of the geocoded location	This comment is related to the CDFI Fund mapping system and will be considered in the future.
171	3/1/2021	Popular Community Development	Natalia Guzman	Community Outcomes	Question 26(a)(6) Financing Minority Businesses	Guidance	Expand guidance and FAQ to encourage and measure investments benefiting majority minority Low-Income Communities and impacts on minority Low-Income People	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.
172	2/22/2021	Travois, Confederated Tribes of the Colville Reservation, Confederated Tribes of the Chehalis Reservation	Phil Glynn, Rodney Cawston, Harry Pickernell	Business Strategy	Question 20	Application	Propose text edit to 3rd note of Q20: "unless can clearly demonstrate it employs the same process for sourcing transactions, ..."	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
173	2/22/2021	Travois, Alaska Growth Capital, Confederated Tribes of the Colville Reservation, Confederated Tribes of the	Phil Glynn, Taka Tsukada, Rodney Cawston, Harry Pickernell	Community Outcomes	Question 26(a)(7)	Application	Support the addition of "Financing Native American Businesses"	The CDFI Fund revised this question based on public comments.

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
		Chehalis Reservation						
174	2/16/2021	BrightBridge Capital	Monica Blanton	General	FEMA designation lookback period	Reporting and Compliance	Extend FEMA designation lookback period to more than 24 months	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
175	3/1/2021	National Bankers Association	Robert James II	General	Application	Review Process	Broaden review to include impact of capital reinvested, provide points for Applicants willing to reinvest fee revenue	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
176	3/1/2021	National Bankers Association	Robert James II	Business Strategy	General	Review Process	Remove requirement for Applicants to have transactional experience in a particular type of projects (ie. Healthy food or healthcare)	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
177	3/1/2021	New Markets Tax Credit Coalition	Robert Rapoza	Glossary of Terms	Disadvantaged Business	Application	Revert to original definition of "Disadvantaged Business", or modify definition to proposed text	The CDFI Fund revised this definition based on public comments.
178	3/1/2021	National Bankers Association	Robert James II	General	CDEs partnering as Applicants	Review Process	Place limits on repeat Allocatees that refuse to partner with MDIs or minority CDEs	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
179	3/1/2021	New Markets Tax Credit Coalition	Robert Rapoza	Business Strategy	Question 17(c)	Application	Add character limits from 8,000 to 10,000	This comment would not reduce burden in completing the NMTC Program Application and is not necessary for the CDFI Fund's evaluation.
180	3/1/2021	New Markets Tax Credit Coalition	Robert Rapoza	Business Strategy	Question 17(c)	Application	Expand second bullet to discuss how pipeline projects fit into the strategy and goals	The CDFI Fund revised Question 12 based on public comments.

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
181	3/1/2021	New Markets Tax Credit Coalition	Robert Rapoza	Community Outcomes	Third party metrics	Guidance	Remove third-party metrics requirement for environmental sustainability, healthy foods, etc	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.
182	3/1/2021	New Markets Tax Credit Coalition, NMTC Working Group,	Robert Rapoza, Brad Elphick	Business Strategy	Question 20 and Exhibit B	Application	Focus question or limit discussion of Controlling Entity to a discrete division for applicants with large Controlling Entities	The CDFI Fund is maintaining the current requirements for this question, which is necessary for the application evaluation.
183	3/1/2021	New Markets Tax Credit Coalition, NMTC Working Group,	Robert Rapoza, Brad Elphick	Management Capacity	Question 34 Fees	Application	Clearly state fees imposed after the seven year compliance period should also be included	The CDFI Fund revised this question based on public comments.
184	3/1/2021	New Markets Tax Credit Coalition, NMTC Working Group,	Robert Rapoza, Brad Elphick	Glossary of Terms	Controlling Entity	Guidance	Consider how to grand-father in the new definition with existing allocatees who met the old definition	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
185	3/1/2021	New Markets Tax Credit Coalition, NMTC Working Group, Enterprise Community Partners, Chicago Community Loan Fund	Robert Rapoza, Brad Elphick, Chimeka Gladney, Calvin Holmes	Business Strategy	Question 18	Application	Remove second bullet due to potential burden and lack of meaningful info, incorporate into Q29(c)	The CDFI Fund revised this question based on public comments.
186	3/1/2021	New Markets Tax Credit Coalition, NMTC Working Group, African American Alliance of CDFI CEOs, Chicago Community Loan Fund	Robert Rapoza, Brad Elphick, Donna Gambrell, Calvin Holmes	AMIS	Glossary of Terms	IT Enhancement	Add enhancement to electronic application so definition from glossary of terms is displayed when Applicant hovers over the term	The CDFI Fund will consider additional enhancements to AMIS functionality in future application rounds.
187	3/1/2021	New Markets Tax Credit Coalition	Robert Rapoza	General	NOAA	Customer service	Give 90 days of advance notice prior to release of NOAA	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
188	3/1/2021	New Markets Tax Credit Coalition, NMTC Working Group, Blooming Ventures	Robert Rapoza, Brad Elphick, Elaine DiPietro	Business Strategy	Question 17(c)	Application	Remove wording "minimum and maximum" dollar amounts of proposed NMTC investments" or add clarification to how Applicants can provide meaningful answer	The CDFI Fund revised this question based on public comments.
189	3/1/2021	New Markets Tax Credit Coalition, NMTC Working Group, Michigan Community Capital, National Trust Community Investment Corporation	Robert Rapoza, Brad Elphick, Eric Hanna, Merrill Hoopengardner	Community Outcomes	Question 26(a)(8) Housing	Guidance	Expand definition of affordable units to include workforce housing or "nationally occurring affordable housing" at 80-100% AMI	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
190	3/1/2021	New Markets Tax Credit Coalition, NMTC Working Group, National Trust Community Investment Corporation	Robert Rapoza, Brad Elphick, Merrill Hoopengardner	Glossary of Terms	Controlling Entity	Application	Clarify definition whether sub-bullet A or B, as well as C and D are needed	The CDFI Fund revised this definition based on public comments.

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
191	3/1/2021	New Markets Tax Credit Coalition, NMTC Working Group, National Bankers Association	Robert Rapoza, Brad Elphick, Robert James II	Glossary of Terms	Enforcement Action	Application	Amend definition to "an formal action or admin order"	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.
192	3/1/2021	New Markets Tax Credit Coalition, NMTC Working Group, Forward Community Investments, Michigan Community Capital, Cinnaire	Robert Rapoza, Brad Elphick, Tracy Hubbard, Eric Hanna, Peter Giles	Management Capacity	Question 34 Fees	Application	Clarify instructions on whether fees are contingent or conditional	The CDFI Fund revised this question based on public comments.
193	3/1/2021	New Markets Tax Credit Coalition, Opportunity Fund, Enterprise Community Partners	Robert Rapoza, Chris Huang, Chimeka Gladney	Community Outcomes	Question 26	Guidance	Provide a list of specific sources and metrics for project types and community outcomes, provide several detailed examples for each community outcome	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
194	3/1/2021	New Markets Tax Credit Coalition, Opportunity Fund, LISC, Chicago Community Loan Fund	Robert Rapoza, Chris Huang, Matthew Josephs, Calvin Holmes	Community Outcomes	Question 26	Application	Increase current 5000 character limit, especially increase to 10,000 character limit for Q26(a)(5) community goods and services	The CDFI Fund revised this question based on public comments.
195	3/1/2021	New Markets Tax Credit Coalition, Blooming Ventures LLC	Robert Rapoza, Elaine DiPietro	Management Capacity	Question 33(e)	Application	Remove part E of Q33, seems to duplicate Q34(c)	The CDFI Fund is maintaining the current requirements for this question, which is necessary for the application evaluation.
196	3/1/2021	New Markets Tax Credit Coalition, Michigan Community Capital, Advantage Capital	Robert Rapoza, Eric Hanna, Jonathan Goldstein	Community Outcomes	former Question 27 "Additional Investment"	Application	Increase character limit of Q27(c) and Q27(d) from 3000 to 5000 to allow for more context now missing from removal of question on "Additional Investment"	This comment would not reduce burden in completing the NMTC Program Application and is not necessary for the CDFI Fund's evaluation.
197	3/1/2021	New Markets Tax Credit Coalition, Florida Community Loan Fund	Robert Rapoza, Ignacio Esteban	Business Strategy	Question 24	Application	Suggest text edits and clarification for related notes	The CDFI Fund revised this question based on public comments.

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
198	3/1/2021	New Markets Tax Credit Coalition, Florida Community Loan Fund	Robert Rapoza, Ignacio Esteban	Community Outcomes	Question 26	Guidance	Consider how applicants might better describe multi-component projects	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.
199	3/1/2021	New Markets Tax Credit Coalition, Ignacio Esteban	Robert Rapoza, Ignacio Esteban	Management Capacity	Question 34(b)	Application	Suggest text edits and clarification for first bullet	The CDFI Fund revised this question based on public comments.
200	3/1/2021	New Markets Tax Credit Coalition, Corporation for Supportive Housing, National Trust Community Investment Corporation, Florida Community Loan Fund	Robert Rapoza, Jill Steen, Merrill Hoopengardner, Ignacio Esteban	Community Outcomes	Question 26	Application	Add "other" to as a new community outcomes category	This comment would not reduce burden in completing the NMTC Program Application and is not necessary for the CDFI Fund's evaluation.

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
201	3/1/2021	New Markets Tax Credit Coalition, Craft3	Robert Rapoza, Maggie Kirby Weiland	Business Strategy	Question 20(b)	Application	Clarify meaning and intent of Q20(b) 3rd bullet, seems to overlap with Section 4 Raising Capital	The CDFI Fund revised this question based on public comments.
202	3/1/2021	New Markets Tax Credit Coalition, OFN, NMTC Working Group	Robert Rapoza, Mary Scott Hardwick, Brad Elphick	Community Outcomes	Former Question 26(a)(14)	Application	Restore question for Healthy Food Financing; add food bank and pantries to examples	The CDFI Fund made revisions to Question 26(a)(4) and Question 26(a)(5) to ensure Healthy Food Financing activities may be described and evaluated with other similar outcomes.
203	3/1/2021	New Markets Tax Credit Coalition, OFN, NMTC Working Group, Forward Community Investments, Cinnaire	Robert Rapoza, Mary Scott Hardwick, Brad Elphick, Tracy Hubbard, Peter Giles	Management Capacity	Question 34 Fees	Guidance	Add instructions to clarify how Applicants will use exit fees and/or all or part of equity redeployed in LICs	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
204	3/1/2021	New Markets Tax Credit Coalition, National Trust Community Investment Corporation	Robert Rapoza, Merrill Hoopengardner	Business Strategy	Question 19	Application	Add an open-ended "Other Innovative Uses" option	This comment would not reduce burden in completing the NMTC Program Application and is not necessary for the CDFI Fund's evaluation.
205	3/1/2021	Confederated Tribes of the Colville Reservation, Confederated Tribes of the Chehalis Reservation	Rodney Cawston, Harry Pickernell	Glossary of Terms	Disadvantaged Business	Application	Include "a nonprofit with a board that is comprised of 51% of more of Low-Income Persons" under part B "Owned by a Low-Income Person"	The CDFI Fund revised this definition based on public comments.
206	2/24/2021	SZ Consulting	Sean Zielenbach	General	Review Process	Review Process	Change scoring weights of Phase 1 and 2 to align more closely with CDFI Fund's policy priorities	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
207	2/24/2021	SZ Consulting	Sean Zielenbach	Business Strategy	Question 21 or 22(e)	Review Process	Permit applicants to discuss relevant activity occurring more than five years ago	The CDFI Fund is maintaining the current requirements for this question, which is necessary for the application evaluation.
208	3/1/2021	New Markets Tax Credit Coalition, NMTC Working Group, Blooming Ventures	Robert Rapoza, Brad Elphick, Elaine DiPietro	General		Customer service	Merge NOAA, Application and FAQs into one application document. Incorporate FAQs into application as notes	The CDFI Fund will consider changes in future application rounds.
209	2/24/2021	SZ Consulting	Sean Zielenbach	Exhibits	Table A5	Guidance	Add 3 short narratives similar to CMF: 1) brief description, 2)importance of project/business, 3) why it needs NMTC financing	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.
210	2/24/2021	SZ Consulting	Sean Zielenbach	Business Strategy	Question 17(d)	Application	Propose refocusing question on whether Applicant intends to co-invest, in what situations, and whether it has certain CDE partners in mind	The CDFI Fund revised this question based on public comments.

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
211	2/24/2021	SZ Consulting	Sean Zielenbach	Glossary of Terms	Disadvantaged Business	Application	Add "owned or controlled" in addition to "owned"	The CDFI Fund revised this definition based on public comments.
212	3/1/2021	Alaska Grown Capital	Taka Tsukada	Community Outcomes	Question 26(a)(4)	Guidance	Add "broadband internet, environmental infrastructure and utilities" as examples of commercial goods and services	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.
213	3/1/2021	Forward Community Investments, Cinnarie	Tracy Hubbard, Peter Giles	Community Outcomes	Question 26(a)(5) Community Goods and Services	Guidance	Update instructions and guidance for applicants who invest in diverse variety of non-profit sponsored community facilities discussing track record and third-party metrics	The CDFI Fund will consider providing additional guidance based on this comment in future NMTC application rounds.
214	3/1/2021	U.S. Bancorp Community Development Corporation (USBCDC), New Markets Tax Credit Coalition	Zachary Boyers, Robert Rapoza	Community Outcomes	Question 26	Application	Expand instructions or add question to allow indirect community outcomes resulting from loans or investments from Exhibit A and B	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.