

Community Development Financial Institutions Fund, Department of the Treasury

Supporting Statement – Part A
CDFI Program and NACA Program Annual Compliance Reports
OMB Control Number 1559-XXXX

A. Justification

1. Circumstances necessitating collection of information

The Community Development Financial Institutions (CDFI) Program provides financial and technical assistance to selected organizations certified by the CDFI Fund as CDFIs, or entities that propose to become CDFIs, in order to enhance their ability to make loans and investments and provide services for the benefit of designated investment areas and targeted populations. According to appropriations legislation, these also include selected Native American organizations certified by the CDFI Fund as CDFIs, or entities that propose to become CDFIs, in order to enhance their ability to make loans and investments and provide services for the benefit of Native American communities and individual Native Americans. Based on an Assistance Agreement between each Recipient and the CDFI Fund, annual compliance reports are used to collect information for compliance monitoring and recordkeeping purposes. The annual compliance reports, including the Performance Progress Report (PPR), Financial Statement Audit Report (if applicable), and Single Audit Report (if applicable), provide qualitative and quantitative information on the Recipient's compliance with its performance goals, its financial health, and the timeline in which the CDFI Fund's financial and technical assistance was used.

The CDFI Fund received a total of nine (9) comments from three (3) organizations on the annual compliance reports data collection. All of the public comments received were to provide more clarity of the guidance for reporting organizations. These public comments will be addressed once the CDFI and NACA Program Annual Compliance Reports are built out in the web-based tracking system used by the CDFI Fund, known as the Awards Management Information System (AMIS). Please see Appendix A. Public Comment Adjudication Table.

2. Method of collection and use of data

The CDFI Fund will collect the Annual Compliance Report data on an annual basis according to the Recipient's fiscal year end. The data will be used to determine if a Recipient is in compliance with the terms and conditions of its Assistance Agreement.

3. Use of Information Technology

The CDFI Fund will collect information electronically and/or use online collaboration tools to reduce burden. The CDFI Fund is implementing web-services software to draw data from Federal Financial Institution Call Reports for certified regulated CDFIs in order to improve efficiency and reduce reporting burden.

4. Efforts to identify duplication

The CDFI Fund has ensured no similar data is gathered or maintained by the CDFI Fund or are available from other sources known to the CDFI Fund. The CDFI Fund does not request information that is publicly available from other Federal agencies, and new software will pre-populate publicly available financial data from call reports for regulated institutions that submit the Annual Compliance Report. All of the information requested is required in order to determine if a Recipient is in compliance with the terms and conditions of its Assistance Agreement.

5. Impact on small entities

Small business or other small entities may be involved in these efforts; however, the CDFI Fund will minimize the burden on them by using the information collected under this clearance by sampling, asking for readily available information, and using short, easy-to-complete information collection instruments. This collection of information is not expected to have a significant impact on small entities because the data needed to complete the annual compliance reports is obtained from the standard accounting information that all entities use to complete end of year Financial Statement Audit Reports.

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

The CDFI Fund cannot determine Recipient compliance with their Assistance Agreement(s) or measure annual performance without this annual collection of data.

7. Circumstances requiring special information collection

Not applicable.

8. Consultation with Persons outside the Agency

Pursuant to the notice and request for comments published in the Federal Register on May 2, 2018, at 83 FR 19402, the CDFI Fund received detailed comments on or before July 2, 2018 from 3 organizations responding to the solicitation for a total of 9 unique comments. The majority of the comments were related to clarifications of questions and guidance, and recommendations on advanced notice of changes in the data collection and improvements of data entry into the CDFI Fund managed web-based application system.

9. Provision of payment to respondents

No payments or gifts will be made to respondents.

10. Assurance of confidentiality

The CDFI Fund is subject to all Federal regulations with respect to confidentiality of information supplied in the annual compliance reports. Access to data submitted in response to this information collection will be limited to Recipients, and their designated representatives, CDFI Fund staff and, if applicable, designated contractors who are subject to all Federal regulations and have completed annual privacy and cybersecurity training.

11. Justification of sensitive questions.

No questions of a sensitive nature will be asked through this information collection. No personally identifiable information will be collected.

12. Estimate of the hour burden of information collection.

Estimated Annual Reporting Burden				
Type of Collection	Number of Respondents	Annual Frequency per Response	Hours per Response	Total Hours

Estimated Annual Reporting Burden				
CDFI Annual Performance Progress Report	855	1	.5	427.5
CDFI Annual Financial Statement Audit Report (if applicable)	430	1	.5	215
CDFI Annual Single Audit Report (if applicable)	430	1	.5	215

13. Estimate of total annual cost burden to respondents

There are no additional capital, start-up or ongoing operational, or maintenance costs associated with this information collection.

CDFI Annual Performance Progress Report

Affected Public	Number of Respondents	Number of Responses Per Respondent	Total Annual Responses	Hours Per Response	Total Hours	Time Value (per Hour)	Monetized Burden Hours
Private Sector	805	1	805	.5	402.5	\$48 ¹	\$19,320
State, Local, and Tribal Governments	50	1	50	.5	25	\$48 ²	\$1,200
Total	855	1	855		427.5		\$20,520

CDFI Annual Financial Statement Audit Report

Affected Public	Number of Respondents	Number of Responses Per Respondent	Total Annual Responses	Hours Per Response	Total Hours	Time Value (per Hour)	Monetized Burden Hours
Private	380	1	380	.5	190	\$48 ³	\$9,120

¹ Bureau of Labor Statistics, Financial Analyst Mean Hourly Wage, May 2017, <http://www.bls.gov/oes/current/oes132051.htm>. Mean Hourly Wage was reported as \$47.80. For purposes of this estimate, this figure has been rounded to \$48.00

² Bureau of Labor Statistics, Financial Analyst Mean Hourly Wage, May 2017, <http://www.bls.gov/oes/current/oes132051.htm>. Mean Hourly Wage was reported as \$47.80. For purposes of this estimate, this figure has been rounded to \$48.00

³ Bureau of Labor Statistics, Financial Analyst Mean Hourly Wage, May 2017, <http://www.bls.gov/oes/current/oes132051.htm>. Mean Hourly Wage was reported as \$47.80. For purposes of this estimate, this figure has been rounded to \$48.00

Sector							
State, Local, and Tribal Governments	50	1	50	.5	25	\$48 ⁴	\$1,200
Total	430	1	430		215		\$10,320

CDFI Annual Single Audit Report

Affected Public	Number of Respondents	Number of Responses Per Respondent	Total Annual Responses	Hours Per Response	Total Hours	Time Value (per Hour)	Monetized Burden Hours
Private Sector	380	1	380	.5	190	\$48 ⁵	\$9,120
State, Local, and Tribal Governments	50	1	50	.5	25	\$48 ⁶	\$1,200
Total	430	1	430		215		\$10,320

14. Estimate of annualized cost to the Government

The three-year staffing costs to the Government are estimated at \$226,000 to manage, analyze and clean the data and answer client help desk questions which include half-time staffing for a GS-14 mid-band staff person and two weeks-time for GS-13 mid-band staff person⁷. The contract costs to the Government for the direct annual maintenance and data collection costs for the ACR submitted through maintain the CDFI Fund's Awards Monitoring Information System (AMIS) are estimated at \$360,000.00 for three years. This cost is paid through a contract to maintain AMIS.

15. Any program changes or adjustments

This submission is a new request for approval. Therefore there is no change in burden.

16. Plans for information tabulation and publication

Although the Agency does not intend to publish its findings, the Agency may receive requests to release the information (e.g., congressional inquiry, Freedom of Information Act requests). The Agency will disseminate the findings when appropriate, strictly following the Agency's "Guidelines for Ensuring the Quality of Information Disseminated to the Public," and will include specific discussion of the limitations of the qualitative results discussed above.

estimate, this figure has been rounded to \$48.00

⁴ Bureau of Labor Statistics, Financial Analyst Mean Hourly Wage, May 2017, <http://www.bls.gov/oes/current/oes132051.htm>. Mean Hourly Wage was reported as \$47.80. For purposes of this estimate, this figure has been rounded to \$48.00

⁵ Bureau of Labor Statistics, Financial Analyst Mean Hourly Wage, May 2017, <http://www.bls.gov/oes/current/oes132051.htm>. Mean Hourly Wage was reported as \$47.80. For purposes of this estimate, this figure has been rounded to \$48.00

⁶ Bureau of Labor Statistics, Financial Analyst Mean Hourly Wage, May 2017, <http://www.bls.gov/oes/current/oes132051.htm>. Mean Hourly Wage was reported as \$47.80. For purposes of this estimate, this figure has been rounded to \$48.00

⁷ <https://www.fedweek.com/pay-tables/2020-gs-pay-table-washington-baltimore-arlington-dc-md-va-wv-pa/>

17. Reasons for not displaying expiration date of OMB approval

The CDFI Fund believes displaying an OMB expiration date on this collection will create the incorrect perception that this information request is to run for a shorter term than the Recipient's Assistance Agreement(s).

18. Explanation of exceptions to certification statement

Not applicable.

B. Collections of Information Employing Statistical Methods

Not applicable

Appendix A. Public Comment Adjudication Table

Date of Comment	Author Name	Author Position	Organization	Comment	CCME Office Response
5/2/2018	Betsy Boylston	Senior Compliance and Closing Officer	Network for Oregon Affordable Housing (NOAH)	Inquired if this annual compliance report would replace an existing annual compliance report already collected (Institution Level Report (ILR) & Transaction Level Report (TLR))	The CDFI Fund will still require Recipients to submit the ILR & TLR as specified in the Assistance Agreement.
6/14/2018	Daniel Sloan	Senior Consultant	FUND Consulting, LLC	Recommended that the annual compliance reports be completed and submitted fully within AMIS, rather than as an uploaded word document.	Comment will be addressed in operating procedures when developed within AMIS.
6/14/2018	Daniel Sloan	Senior Consultant	FUND Consulting, LLC	Recommended the need for clearer guidance on which reports are required for each Recipient, and the actual content Recipients need to provide in the reports.	This information is already provided via the counter-signed Assistance Agreement and other outreach materials. Comment will also be addressed when form is developed in AMIS through web-based help text.
6/14/2018	Daniel Sloan	Senior Consultant	FUND Consulting, LLC	Recommended the need for increased clarity as to how regulated institutions should complete the Financial Statement Audit Report, and what documentation, if any, should be uploaded.	Comment will be addressed when form is developed in AMIS through web-based help text.
6/14/2018	Daniel Sloan	Senior Consultant	FUND Consulting, LLC	Recommended the need for increased clarity as to whether Recipient's with Fiscal Year (FY) 2015 and newer awards need to complete and submit both the PPR and the Performance Goals and Measure Report, or only the PPR.	Comment will be addressed when form is developed in AMIS through web-based help text.
6/14/2018	Daniel Sloan	Senior Consultant	FUND Consulting, LLC	Recommended the need for increased clarity as to how Recipients should provide data points in the PPR related to Performance Goal 2 Measure 1: Deployment to Target Market.	This information is already provided via the counter-signed Assistance Agreement and other outreach materials. Comment will also be addressed when form is developed in AMIS through web-based help text.

Date of Comment	Author Name	Author Position	Organization	Comment	CCME Office Response
6/14/2018	Daniel Sloan	Senior Consultant	FUND Consulting, LLC	Recommended that when annual compliance reports are changed, that announcements be made well ahead of the report submission deadlines.	Comment will be addressed when form is developed in AMIS, prior to the report deadline.
6/14/2018	Daniel Sloan	Senior Consultant	FUND Consulting, LLC	Recommended that Recipients be given an overview of the data collected through the annual compliance reports when the Recipient signs the Assistance Agreement.	This information is already provided via the counter-signed Assistance Agreement and other outreach materials.
7/19/2018	Lauren Rosenbaum	Program Manager	Accion	Respondent writes that they find the reports to be reasonable in terms of the information requested and the expected cost to complete them.	N/A: Comments concur with intended course of action.