

U.S. Department of Treasury Community Development Financial Institutions Fund

### QEI Closeout Report Guidance

February 2023

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**Disclaimer:** This document is intended to serve as public guidance for the subject matter contained herein. The CDFI Fund reserves the right, however, to modify this guidance at any time upon public notice. The examples contained in this guidance are not exhaustive in nature and the CDFI Fund has the discretion to consider additional factors when determining matters of compliance.

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The Closeout Report is the CDFI Fund's approach to aggregate an Allocatee's use of Qualified Equity Investment (QEI) proceeds and to gather additional information on the status of the Qualified Low-Income Community investment (QLICI) and Qualified Active Low-Income Community Business (QALICB) at the end of the tax credit compliance period.

Allocatees are now required to report on QEIs that have reached the end of the 7-year tax credit compliance period. The QEI Closeout Report must be filed after the Transaction Level Report (TLR) and Institution Level Report (ILR) have been submitted for QEIs that have reached the end of their compliance period. The information entered into the TLR and ILR reports will then be used to prepopulate the QEI Closeout Report. The link for the QEI Closeout Report can be found on the menu bar of the AMIS Homepage.

#### Who to contact for help

If Allocatees are having technical difficulty (e.g., discrepancies between the QEI Closeout Report and the TLR are identified or system errors), the most effective means of requesting support is submitting a Service Request. From the AMIS Service Request tab, select the "Create New Service Request" button. Ensure that "Compliance and Reporting" is selected for Program and "New Markets Compliance" is selected as Program Topic.

Alternatively, the Allocatee may send an email to <u>AMIS@cdfi.treas.gov</u>. Please type, "NMTC: QEI Closeout Report assistance needed" in the subject line of the email. A technical support staff person will generally reply within 24 hours on weekdays. Allocatees may also phone the CDFI Fund IT Help Desk at (202) 653-0422. If a technical support staff person is unavailable to immediately assist, please leave a message and a staff person will return the call within 36 hours on weekdays.

To create a new Closeout Report, log into the AMIS portal and select the Closeout Reports tab.

#### Figure 1: 'Closeout Report' Tab

•

Home	Organizations	Allocations	Contacts	Service Areas	Service Requests	Awards	Reporting Schedule	CMF Performanc	e Report More 🔨
Recent Ite	ems			My Tasks					Closeout Reports Multi-CDE Projects
				Today	•				TLR Notes
				Completed	Date		Status	Subject	TLR Projects

Once on the Closeout Reports page click on the "Create New Closeout Report" button.

#### Figure 2: 'Create New Closeout Report' Button

						C	reate (	Closeout	Report	t
Closeout Reports								Printab	le View	v
0 items • Sorted by NMTC Closeout Report Name • Filtered by All closeout rep	orts • Updated a minute ago		Q Search this I	ist	- ¢	•	C		¢ `	Ŧ
NMTC Closeout Report Name ↑ 🗸 🗸	Organization $\checkmark$	Reporting Fiscal Year	~	Certification Date				~		

After clicking on the "Create New Closeout Report" button, the user will be directed to a page where they will need to use the search icon to select their organization that they wish to complete a closeout report for, as well as select the fiscal year (FY2017 or later) they would like to complete the QEI Closeout Report for.

#### Figure 3: Select Organization and Fiscal Year

			g the QEI Closeout Reporting requirement for the FY203	15 and
FY2016 reporting periods. If applicab	le, Allocatees must complete QEI Close	out Reports for their FY2017 reporting pe	riod and later reporting periods using AMIS.	
Colort Operation Fee Depart Counting				
Select Organization For Report Creation				
Search Organizations				Q
Select Fiscal Year				
Select an Option				-

After clicking on the "Continue" button, the system will display a success message.

Figure 4: Display Closeout Report Creation Success Message

CDFI FUN	Dr		C.		ed for CNB Economic Develop	oment Company, LLG		<b>.</b>	
Home	Organizations	Allocations	Contacts	Service Areas	Service Requests	Awards	Reporting Schedule	CMF Performance Report	More 🗸
	eout Report R-00814							Printable View	Edit
Details	Related								
NMTC Closeou COR-00814	ut Report Name				Created By	McMillan, 2/8/2022	1:08 PM		

#### **Closeout Report Data Points**

#### <u>QEI Detail</u>

To begin entering QEI information click on one of the QEI names, located in the QEI related list, to view the associated QEI information. (*Figure 4*)

Note: To complete the Closeout Report, the user must enter data for every QEI listed. The QEI Closeout Report is based on the 7-year tax credit period of the QEI rather that the loan status of the QLICI. As such, estimates can be used if the QLICI's exit occurs after the QEI Closeout report is due.

Figure 5: QEI Related list on Closeout Report Detail Page

Closeout Report COR-00814				Printable View	Edit
etails Related					
QEIs (4)					
QEI Name	AMIS QEI Identifier	Associated Allocation	Date of Original QEI		
QEI Name QEI00003451	AMIS QEI Identifier 08QEI00003451	Associated Allocation NMTCAward-000473	Date of Original QEI 10/30/2013		Ţ
-	-		-		
QEI00003451	08QEI00003451	NMTCAward-000473	10/30/2013		•

On the QEI Detail Page, the fields below require a user entered response. (*Figure 5*)

Figure 6: QEI Detail Page Required and Conditionally Required Fields.

CLOSEOUT REPORT	Save Changes In QEI Detail Se	Back To Report	
QEI Detail			= Required Information
Name: Date of Original QEI: Amount:	QE100027869 7/8/2011 \$7,000.00	QEI Identifier: Associated Allocation: Completed?	QE100027869 NMTCAward-001118
Loan Loss Reserves:	2000.00		
Loan Loss Reserve Usage at QEI Closeout:	Retained by CDE or an Affiliate	τ	
Loan Loss Reserves Other:			
Projects			
Name TLRP-00187258		Description OTHER	Completed?

#### Loan Loss Reserves

Report the dollar amount of the QEI that was used for Loan Loss Reserves.

• If this amount exceeds 5% of the Original QEI Amount, a warning message will be displayed. The warning message will not prevent the amount from being submitted, but it serves as an advisory to review the amount entered for accuracy.

**NOTE:** This field is auto-populated with the amount reported in the QEI Disbursement Report summary for the individual QEI. As such, any changes to this amount must be made to the QEI Disbursement Report.

#### Loan Loss Reserves Usage at Closeout

Select a response from the provided dropdown menu. (This field will be disabled if a response of zero is entered for Loan Loss Reserves)

- Retained as Loan Loss Reserves (for an active loan or additional loans)
- Retained by the CDE or an affiliate Distributed to Investor
- Provided to Borrower
- Other (A response in the text box is mandatory if this option is selected)

Click the "Save Changes to the QEI Detail Section" button.

#### **Project Detail**

For each QEI, the system will pre-populate all of the associated projects from the most recently submitted TLR. Under the Projects related list, click on the Project Name associated. (Figure 6)

#### Figure 7: TLR Project Hyperlink on QEI Detail Page

CLOSEOUT REPORT	Save Changes In QEI Detail S	Back To Report			
		QEI Detail Information was updated	]		
QEI Detail					= Required Information
Name: Date of Original QEI: Amount:	QE100027869 7/8/2011 \$7,000.00		QEI Identifier: Associated Allocation: Completed?		
Loan Loss Reserves:	2000.00				
Loan Loss Reserve Usage at QEI Closeout:	Retained by CDE or an Affiliate	٣			
Loan Loss Reserves Other:					
Projects					
Name		Description		Completed?	
TLRP-00187258		OTHER			

On the Project Detail's Page, the Business Description Expanded field is required. (*Figure 7*)

#### Figure 8: Required Field on Project Detail Page

CLOSEOUT REPORT		Save Changes in Project Detail Section Back To QEI			
Project Detail					= Required Information
Busir	Project Number: 001 ess Description: OTHER ption Expanded:	<b>←</b>			
Transactions					
Name	Originator Transaction ID	Original Loan/Investment Amount	Loan Status	Purpose	Completed?
TLRN-00124545	12365	\$50,000.00	ACTIVE	BUSINESS	

#### **Business Description Expanded**

Allocatees are required to provide additional details on the business description

• Provide additional information to elaborate on the description of the business/project and services in 300 characters or less.

Click the "Save Changes to the Project Detail Section" button.

#### **Transaction Detail**

Each Originator Transaction ID that has been reported and certified for the QEI will display under the Transactions related list on the associated project detail page. Click on each Transaction Name to enter further data. (*Figure 7*)

Figure 9: TLR Transaction Hyperlink on Project Detail Page

CLOSEOUT REPORT	Save Changes in Project Detail Section Back To QEI			
	Record was	updated		
Project Detail				= Required Information
Project Number: 001 Business Description: 01HER Business Description Expanded: User Guide Exc	nple			
Transactions				
Name Originator Transaction ID	Original Loan/Investment Amount	Loan Status	Purpose	Completed?
TLRN-00124545 - 12365	\$50,000.00	ACTIVE	BUSINESS	

The fields below require a user entered response. (*Figure 8*)

Figure 10: Example of Required and Conditionally Required Fields on Transaction detail Page

Transaction Questions	
Is this a Performing or Non-Performing?	Non-Performing Loan 🗸
Considering the proposed products in the Applicant's original Allocation Application, was the overall financing package to this QALICB intended to allow the QALICB to acquire all or a portion of the residual value of the tax credit equity?	Yes v
Was this financial note structured to allow the QALICB to acquire all or a portion of the residual value of the tax credit equity?	Yes v
To the extent the investment was structured to allow the OALICB to acquire a portion of the OLICB stat the end of the seven-year compliance period, quantify the value of the investment acquired by the QALICB at the end of the seven-year compliance period as a dollar amount:	2699900.00
Status of QALICB at end of tax credit period or date of dissolution, termination, or write-off:	Not placed into service V
Comments on QALICB Status:	Test Comments

The Loan Status and Purpose fields of the transaction that were reported in the most recent TLR will determine the types of Transaction Questions the user will be required to answer for each transaction in the QEI Closeout Report.

#### Field(s) required for Loan Status of 'ACTIVE' or 'ACTIVEEND'

#### Is this a Performing or Non-Performing Loan?

Select a response from the provided dropdown menu:

• Performing (payments for the loan have been made in full and on time)

• Non-Performing (payments for the loan have not been made for at least 90 days)

#### Field(s) required for Loan Status of 'Refinanced' or 'Sold'

#### **Refinanced or Sold**

Choose a response from the following options from the provided dropdown.

- Sold to Affiliated (with the CDE) Entity
- Sold to Non-Affiliated (with the CDE) Entity
- Refinanced by Affiliated (with the CDE) Entity (if this option is selected a response to the question below is required)
- Refinanced by Non-Affiliated (with the CDE) Entity (if this option is selected a response to the question below is required)

#### Refinanced by Affiliated (with the CDE) Entity or Refinanced by Non-Affiliated (with the CDE) Entity.

For transactions that have been "Refinanced by Affiliated Entity" or "Refinanced by Non-Affiliated Entity," choose the source of capital used for refinancing from the following options. (Example: If the NMTC financial note was refinanced with bank debt from a market rate lender, select "Financing provided by private sector sources." If it was refinanced with a loan from a CDFI with access to below market capital, select "Financing provided by philanthropic or other non-governmental sources.")

- Financing provided by private sector sources · Financing provided by philanthropic or other nongovernmental sources
- Financing provided by state or local government program
- Financing provided by federal program · Financing provided by multiple types of sources
- Other If "Other" is selected, provide a response of up to 50 characters in the provided text box.

#### Field(s) required for transactions with a Loan Status of 'Closed'

#### **Converted to Equity**

Select YES or NO from the provided dropdown menu for Converted to Equity (selecting the NO option would indicate that the transaction was paid in full).

**NOTE**: In cases where the QLICI is assigned to the investment fund:

- Select "NO" if the QLICI was assigned to the investment fund after the 7 year tax credit compliance period.
- Select "YES" if the QLICI was assigned to the investment fund after the 7 year tax credit compliance period and the investment fund is owned or controlled by the QALICB or Affiliate of the QALICB.

## Field(s) required for transactions with a Loan Status of "Charged-Off' or Restructured with Charge-Off'

#### **Reason for the QLICI Charge-Off or Restructuring**

Enter in the text box provided the "Reason for the QLICI charge off or restructured".

#### Field(s) required for all transactions

# Considering the proposed products in the Allocatee's original Allocation Application, was the overall financing package to this QALICB intended to allow the QALICB to acquire all or a portion of the residual value of the tax credit equity?

Select YES or NO from the provided drop-down menu.

Was this financial note structured to allow the QALICB to acquire all or a portion of the residual value of the tax credit equity?

Select YES or NO from the provided drop-down menu.

# To the extent the investment was structured to allow the QALICB to acquire a portion of the QLICIs at the end of the 7-year compliance period, quantify the value of the investment acquired by the QALICB at the end of the 7-year compliance period as a dollar amount

Enter the value of the investment acquired by the QALICB in dollars:

• The amount should not exceed the original QEI amount.

The "value received" should be minus the "put price" and "exit fees" paid by the QALICB

#### Status of QALICB at end of tax credit period or date of dissolution, termination, or write-off

Selection for transactions with 'Purpose' of any Real Estate option (i.e. RECOCOM, RECOMULTI etc.) Select from the following options:

- Placed into service
- Not placed into service (if this option is selected please elaborate below in 'Comments on QALICB status')

#### Selection for transactions with a Purpose of 'BUSINESS' or 'MICRO'

Select from the following options:

- Continues as a going concern
- No longer in existence service (if this option is selected please elaborate below in 'Comments) on QALICB status'.

#### **Comments on QLICB Status**

This field is required if "Not placed into service" or "No longer in existence" is selected for 'Status of QALICB at end of tax credit compliance period or date of dissolution, termination, or write-off'.

• Provide the legal name of the business(s) and the state in which they are located.

Click the "Save Changes in Transaction Questions Section" button.

Click the "Back to Project" button, then the "Back to Report" button, then click the "Save Changes in QEI Detail Section" button to update all changes that have been made. Once you click save changes on the QEI Detail page, the completed checkbox will be marked.

Click on the "Back to Report" button and repeat each of the steps above until all of the information is provided for each QEI listed. Figure 11: Completed Checkbox on QEI Detail Page

CLOSEOUT REPORT	Save Cha	nges In QEI Detail Section Back To Report		
		QEI Detail Information was	updated	
QEI Detail				= Required Information
Name: Date of Original QEI: Amount:	QE100027869 7/8/2011 \$7,000.00		QEIIdentifier: QE(00027869 Associated Allocation: NMTCAward-001118 Completed?	
Loan Loss Reserves:				
Loan Loss Reserve Usage at QEI Closeout:	Retained by CDE or an Affiliate	•		
Luaii Luas neserives Ulini.	<i>A</i>			
Projects				
Name		Description	Completed?	
TLRP-00187258		OTHER	×	

### **Certification of QEI Closeout Report**

Once all QEI records have been completed, as seen in *Figure 11*, then the final step is certification.

#### Figure 12: Certification Statement and Completed QEIs

Closeout Reports > COR-00814 QEIs 4 items • Updated a few seconds ago									Ŧ
	QEI Name 🗸	A	AMIS QEI Identifier 🗸 🗸	Associated Allocation $\checkmark$	Date of Original QEI 🛛 🗸	Finalize Date $\checkmark$	Amount ~	Completed? $\lor$	
1	QEI00003451	0	08QEI00003451	NMTCAward-000473	10/30/2013	10/31/2013	\$11,000,000.00	×	
2	QE100003452	0	08QEI00003452	NMTCAward-000473	12/11/2013	12/20/2013	\$8,000,000.00	×	
3	QE100003453	0	08QEI00003453	NMTCAward-000473	12/11/2013	12/20/2013	\$9,000,000.00	×	
4	QEI00003454	0	08QEI00003454	NMTCAward-000473	12/11/2013	12/20/2013	\$8,000,000.00		

#### Read the certification and mark both certification statement checkboxes. (Figure 11)

#### Figure 13: Certification Agreement Statements

✓ Certification					
Certified	Certification Date				
✓ Certification Statement					
To the best of the Allocatee's knowledge and belief, all information contained in this Closeout Report is true, accurate, and complete. The Allocatee hereby certifies that the Closeout Report accurately represents the activities and performanc of the Allocatee and/or Subsidiary Allocatee that issued the QE(s) described. Upon request from the CDFI Fund, the Allocatee agrees to provide any additional information to the CDFI Fund necessary to substantiate or clarify the information submitted in the Closeout Report. The submission of this Closeout Report has been duly authorized by all requisite corporate or partnership action of the Allocatee.					
Check "I have reviewed the statement" if you have reviewed the certification statement above and agree. Check "TLR and ILR Certified" if the final Transaction Level Report (TLR) and Institution Level Report (ILR) have been submitted for these QEIs.					
Please complete all of the QEIs before submitting/certifying.					
Save the record after checking "I have reviewed the stateme	ent" and "TLR and ILR Certified" checkboxes to Submit/Certify				
TLR and ILR Certified	5				
In avereviewed the statement					

#### Next, click the "Save" button.

	Certification tified Certification Date					
~	Certification Statement To the best of the Allocates's knowledge and belief, all information contained in this Closeout Report is true, accurate, and complete. The Allocatee hereby certifies that the Closeout Report accurately represents the activities and performance of the Allocate and/or Subsidiary Allocate that issued the QEI(s) described. Upon request from the CDFI Fund, the Allocate agrees to provide any additional information to the CDFI Fund necessary to substantiate or clarify the information submitted in the Closeout Report. The submission of this Closeout Report has been duly authorized by all requisite corporate or partnership action of the Allocatee. Check "TLR and ILR Certified" if the final Transaction Level Report (TLR) and Institution Level Report (ILR) have been submitted for these QEIs. Please complete all of the QEIs before submitting/certifying. Save the record after checking "I have reviewed the statement" and "TLR and ILR Certified" checkboxes to Submit/Certify					
	LR and ILR Certified have reviewed the statement	5 5				
	Cancel					

Note: Once you have submitted and certified the Closeout Report, you will not be able to make any additional changes.

Upon Saving, the certified checkbox will be marked, and the date will be stamped onto the Closeout Report Detail page. *(Figure 12)* 

#### Figure 14: Certified Checkbox and Date

Closeout Report COR-00814		Printable View Ec	dit
Details Related			
NMTC Closeout Report Name	Created By		
COR-00814	Andy McMillan, 2/8/2022 1:08 PM		
Organization	Last Modified By		
CNB Economic Development Company, LLC	Andy McMillan, 2/8/2022 1:34 PM		
Reporting Fiscal Year	Reporting Calendar Year		
2021	2021		
✓ Certification			
Certified	Certification Date		
<b>~</b>	2/8/2022		