

DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220



OMB Contr 559-0014

Appendix A. CDE Certification Application PRA - Summary of Public Comments and CDFI Fund Responses

Comment #	Organization	Author Name	Author Title	Letter Comment Date	Category	Comment	Response
1	Smith NMTC Associates, LLC	Donna Smith	Executive VP	3/15/2023	(a) whether the collection of information is necessary for the proper performance of the functions of the CDFI Fund, including whether the information shall have practical utility	Products and Services to be offered: Business Financing is listed under Real Estate Financing as opposed to being its own category. Previously it was a separate category (presumably for operating capital). Is that intentional?	The CDFI Fund will correct the CDE Application to align with the NMTC Allocation Application.
2	Smith NMTC Associates, LLC	Donna Smith	Executive VP	3/15/2023	(a) whether the collection of information is necessary for the proper performance of the functions of the CDFI Fund, including whether the information shall have practical utility	Is the Market Served estimate for a particular reason? It could be difficult for a CDE to know till it has done at least one round of deployment. I realize this has been in the certification applications for many years, but I just wanted to point this out.	The CDFI Fund has intentionally aligned the categories with that of the NMTC Program, for which CDE Certification is required.
3	Smith NMTC Associates, LLC	Donna Smith	Executive VP	3/15/2023	(d) ways to minimize the burden of the collection of information on respondents , including through the use of technology	Previously, I don't recall the LIC representatives having to sign the form in the application. Is this new? If so, though I understand the rationale, it could be quite cumbersome and difficult to get each board member/LIC representative to sign the form.	The web-based CDE Certification Application does not require each board member to sign the LIC Representative Form.

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4	IFF	Kirby Burkholder Marina Titova	President, Core Business Solutions Managing Director of Structured Finance	5/15/2023	(d) ways to minimize the burden of the collection of information on respondents , including through the use of technology	As CDFIs automatically qualify as CDEs, it seems there might be efficiencies if CDEs created by nonprofit CDFIs had an option simply to confirm their alignment with the CDFIs in applicable areas instead of having to provide information duplicative with the annual CDFI re-certification.	The annual CDFI re-certification process is a separate data collection process with its own distinct PRA. The data requested for CDEs in the CDE Application does not and should not align because these certifications are based on different underlying statutes.
5	IFF	Kirby Burkholder Marina Titova	President, Core Business Solutions Managing Director of Structured Finance	5/15/2023	(d) ways to minimize the burden of the collection of information on respondents , including through the use of technology	The current accountability process includes updating in real time Governing and Advisory Boards on the Organization page in AMIS, and submitting this data with the CDFI, CDE, sub-CDE certification applications, as well as submitting Material Change Forms when changes in the Board membership occur.	The CDE Certification Application and Material Change Form collect different Governing and Advisory Board data and serve different collection purposes.
6	IFF	Kirby Burkholder Marina Titova	President, Core Business Solutions Managing Director of Structured Finance	5/15/2023	NA	It is not very clear at which stage review of the accountability data occurs, if at all. It would be helpful to get clarifications in that regard, in order for CDEs to understand and be able to respond to the lack of verification of accountability data on the Organization AMIS page for an extended period of time.	This comment is not pertinent to the Information Collection Review. The CDFI Fund will clarify the point in time in which the accountability data should be based in guidance materials.
7	IFF	Kirby Burkholder Marina Titova	President, Core Business Solutions Managing Director of Structured Finance	5/15/2023	(a) whether the collection of information is necessary for the proper performance of the functions of the CDFI Fund, including whether the information shall have practical utility	Type of Entity. Without having an active CDE Certification application in process, it is hard to ascertain whether a CDE can select for an entity type both a nonprofit and a Minority-Controlled entity rather than just one of those types. This would be a desirable option that would allow capturing more accurate information on the applicant organizations and their focus of work in the	The CDFI Fund will clarify that the Applicant is able to select both non-profit and minority-controlled options in the guidance materials.

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						low-income communities.	
8	IFF	Kirby Burkholder Marina Titova	President, Core Business Solutions Managing Director of Structured Finance	5/15/2023	NA	Delete button for CDE and sub-CDE applications that were started but cannot be completed would be cost-beneficial compared to going through the process of submitting multiple service requests.	This comment is not pertinent to this Information Collection Review; however, the CDFI Fund will take this recommendation into consideration.
9	African American Alliance of CDFI CEOs	Lenwood V. Long, Sr	President and CEO	5/15/2023	(a) whether the collection of information is necessary for the proper performance of the functions of the CDFI Fund, including whether the information shall have practical utility	The Alliance believes that the information collected during the certification process is essential for the CDFI Fund to fulfill its mission of promoting economic and community development in low-income communities.	The CDFI Fund agrees with the comment.
10	African American Alliance of CDFI CEOs	Lenwood V. Long, Sr	President and CEO	5/15/2023	(b) the accuracy of the CDFI Fund's estimate of the burden of the collection of information	The accuracy of the burden estimate for the collection of information is contingent upon the respondent's familiarity with the application process. If the respondent is already acquainted with the process and has prepared the required information beforehand, the application may take less than four hours to complete. Conversely, if the respondent is inexperienced with the process and must gather all the necessary information, the application may take longer than four hours.	The CDFI Fund's estimation is based on the average time a new applicant and the average time an applicant familiar with the process can complete the Application.
11	African American Alliance of CDFI CEOs	Lenwood V. Long, Sr	President and CEO	5/15/2023	(d) ways to minimize the burden of the collection of information on respondents	The CDFI Fund could offer technical assistance to help organizations understand the application requirements and navigate the process.	The CDFI Fund allows Applicants to request clarification and/or technical assistance prior to the submission of the application.

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					, including through the use of technology	(e.g., webinars or workshops one-on-one consultations with CDFI Fund staff).	
12	African American Alliance of CDFI CEOs	Lenwood V. Long, Sr	President and CEO	5/15/2023	(c) ways to enhance the quality, utility, and clarity of the information to be collected	The CDFI Fund could simplify the application form and reduce the number of required attachments to make the application process less burdensome.	The CDFI Fund requires all of the attachments requested in the application to confirm the applicant's responses.
13	African American Alliance of CDFI CEOs	Lenwood V. Long, Sr	President and CEO	5/15/2023	(c) ways to enhance the quality, utility, and clarity of the information to be collected	The CDFI Fund could extend the application deadline or offer flexible timelines to allow for more time to complete the application process.	The CDE Certification Application does not have deadlines, unless as instructed by the NMTC NOAA. Otherwise, applications can be submitted at any time throughout the year.
14	African American Alliance of CDFI CEOs	Lenwood V. Long, Sr	President and CEO	5/15/2023	(d) ways to minimize the burden of the collection of information on respondents , including through the use of technology	Clear and concise instructions can be provided to applicants that outline the expectations of the CDFI Fund, what documentation is required, and how to complete the forms.	The CDFI Fund agrees. Clear and concise CDE Certification Application guidance will be provided.
15	African American Alliance of CDFI CEOs	Lenwood V. Long, Sr	President and CEO	5/15/2023	(d) ways to minimize the burden of the collection of information on respondents , including through the use of technology	The CDFI Fund can provide resources and training to help applicants better understand the requirements and expectations of the program, as well as the online portal (e.g., webinars, workshops)	The CDFI Fund allows Applicants to request clarification and/or technical assistance prior to the submission of the application.
16	African American Alliance of CDFI CEOs	Lenwood V. Long, Sr	President and CEO	5/15/2023	(d) ways to minimize the burden of the collection of information on respondents , including through the use of technology	Extending the certification period can also reduce the burden of reapplying for certification frequently. For example, currently, certification as a qualified CDE is valid for three years but extending it to five or more years could reduce the number of times entities have to go through the certification process, minimizing the burden on them.	The CDE Certification status does not expire.

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17	African American Alliance of CDFI CEOs	Lenwood V. Long, Sr	President and CEO	5/15/2023	(d) ways to minimize the burden of the collection of information on respondents , including through the use of technology	Simplifying compliance reporting through clear guidelines and increasing transparency can also help to minimize the burden on entities and make the process less time-consuming.	The CDE Certification status does not have compliance reporting requirements.