

Streamlined CDFI Certification for Qualifying LICUs • 2018 Program Guide

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Program Overview

NCUA - CDFI Fund Partnership

On January 21, 2016, the <u>National Credit Union Administration (NCUA)</u> and the <u>U.S. Treasury Department's Community Development Financial Institutions (CDFI) Fund</u> entered into an agreement to streamline the application process for qualifying low-income credit unions to become certified as CDFIs.

In this streamlined application process, NCUA analyzes a low-income credit union's products and services and other indicators showing the likelihood it will qualify for certification. The credit union must submit data to NCUA on its loan originations and identify its target market. If the credit union is qualified, NCUA will provide an application form and the data necessary to complete it. Credit unions are then required to complete the application and forward it to the CDFI Fund for the final determination of the certification.

Credit unions that obtain CDFI certification can access training and competitive award programs provided by the CDFI Fund. These resources enhance credit unions capacity to provide underserved communities with access to safe and affordable financial services.

Transition: Pilot to Program

The Streamlined CDFI Certification Application for Qualifying Low Income Designated Credit Unions (referred to as "the streamlined certification application") was developed in 2016 as a pilot project between the NCUA and CDFI Fund. Select credit unions were invited to participate in this pilot in order to collect and gather results for a full-scale solution.

NCUA began transitioning this pilot project into a full-scale program in December 2016. The streamlined certification application process is now available to all low income designated credit union's (LICU) interested in becoming a CDFI.

Low income credit unions must consider the following to determine whether or not they should submit data for approval to use the CDFI streamlined application:

Credit unions should determine if they are eligible by meeting the "General Requirements" listed below. Next, credit unions should ensure that they can provide the required data files listed in the "Data Requirements" section. Lastly, credit unions



should consider if their 2017 loan activity will qualify according to the "Results of the Geocode Analysis" section. Credit union's that do not meet the general requirements will not have their files reviewed.

Credit unions that do not qualify to use the streamlined certification application are encouraged to pursue the certification through the CDFI Fund's standard application.

2018 Program Intake Periods for Interested LICUs

The streamlined certification application program will consist of three intake periods this year. Each interested LICU may participate in the program only once a year. NCUA will determine and identify the LICUs that qualify to use the streamlined certification application during each period. LICUs that **do not** qualify for the streamlined certification application may still apply for the CDFI certification through the standard application.

Below are the intake periods for interested LICUs.

2018 Intake Periods							
Round #	Start Date**	End Date**					
Special*	Monday, January 22	Friday, February 16					
1	Monday, March 19	Friday, April 6					
2	Monday, June 4	Friday, June 22					
3	Monday, September 10	Friday, September 28					

^{*}NCUA is offering a special intake period for LICUs located in Puerto Rico, Texas, and the U.S. Virgin Islands that were impacted by hurricanes during 2017.

^{**}Each Intake Period will open at 9am ET and close at 3pm ET.



Program Details

Details about the streamlined certification application program will be explained in a Q&A format. The questions are divided into four sections: *general requirements, data requirements, geocode analysis, and the results of the geocode analysis.*

General Requirements

1. Who is eligible to participate?

To participate in the streamlined certification application program, a credit union must meet <u>ALL</u> of the following requirements:

- Be insured by NCUA; and
- Be designated as a low-income credit union by NCUA or a similar State designation confirmed by NCUA.
- Provide at least one of the following Programs & Services to your members: Financial Counseling, Financial Education, Financial Literacy Workshops, In-School Branches, and First-Time Homebuyer Program.

2. Do I need to contact my examiner to participate?

No. But you are encouraged to communicate with your examiner if you plan to participate in the program.

3. How can I participate in the program?

Interested credit unions must complete a participation form during one of the invitation rounds and provide NCUA with their loan files for all 2017 loan originations.

Please go through all of the program details and instructions. This will ensure that you have all of the necessary information required to participate in the program. The URL link for the participation form is located in the Program Instruction section of this document page 9.

Data Requirements

4. Is there any data that I need to provide to NCUA?

Yes. Credit unions must provide a loan file for all <u>loans originated</u> during the past calendar year (<u>January 1 – December 31, 2017</u>). Keep in mind that the amount of loan originations in your file should reflect the total amount of loan



originations reported on your 5300 call report for the period ending December 31, 2017. If there are any differences, please provide a brief explanation describing those differences. The loan file MUST include the following data fields and layout:

Field Name	Field Description			
Mailing Street Address	Member's address of record. Format examples are: "Number and Name of Street". ¹			
City	City associated with the Mailing Street Address.			
State	State associated with the Mailing Street Address.			
Zip Code	Zip code and four-digit identifier associated with the Mailing Street Address. Do not include a hyphen if the four-digit extension is included.			
Other Street Address	Street address other than the mailing address.			
Date of Loan	Date the loan was originally granted. Format date as MM/DD/YYYY			
Original Loan Amount	Original amount advanced for closed-end loans. Total outstanding balance after the last advance for open-end loans.			

5. How do I prepare the loan files that I will submit to NCUA?

You should prepare the loan file according to the data layout below. The file must be submitted in an Excel (.xls or .xlsx) spreadsheet. Below is an example of the preferred format. If you need assistance preparing the loan file in this format, please email us at CURECDFI@ncua.gov.

Mailing Address	City	State	Zip Code	Other Street Address	Date of Loan	Original Loan Amount
1775 Duke Street	Alexandria	VA	22314	(optional)	03/15/2016	500.00

6. How should I provide this data to NCUA?

Credit unions may email their loan file to CURECDFI@ncua.gov through a secured email encryption system called Zixcorp. Submitting your data securely is a priority for NCUA; so following the email instructions on page 9 of this document is extremely important if you select this option.

¹ Please obtain a physical address for member records that have PO Boxes as the address. Our analysis tool does not recognize PO Boxes. Including PO Boxes will have an undesirable impact on the analysis results.



7. <u>How will NCUA handle the personal identifiable information (PII) of my members?</u>

NCUA will not perform an analysis for credit unions that submit files that include PII data. NCUA will remove and discard all of the data fields in the loan file <u>except</u> the required data fields which are listed on pages 4 and 5 of this document. After the analysis is completed, NCUA will delete the data file (if there is any PII in the file).

Geocode Analysis

8. What will NCUA do with the data?

NCUA's Office of Credit Union Resources and Expansion (CURE) will geocode each credit union's loan originations for the past calendar year. The results of the geocode analysis will determine if your credit union is qualified to use the streamlined certification application.

9. How does NCUA's geocode analysis work?

NCUA's geocode analysis determines if your credit union generated a sufficient amount of loan activity to the <u>eligible</u> Target Markets (Investment Areas and Low-Income Targeted Populations by county) in the streamlined certification application.

A credit union's loan activity is considered sufficient for the streamlined certification application if at least 60% of its financial transactions (BOTH the number and dollar amount) are directed to <u>eligible</u> Target Market counties. Eligible Target Market counties may only include the areas where a credit union has an office branch AND the bordering counties to those branches.

10. How long does it typically take to complete a geocode analysis?

The geocode analysis can take 4 to 6 weeks to complete. The timeframe varies depending on several factors prior to performing the analysis. However, CURE aims to complete each analysis and notify all credit unions of the final results within 3 weeks of the intake period closing.

Results of Geocode Analysis

11. What does the result of the geocode analysis mean for my credit union?

The result of your credit union's geocode analysis determines if you qualify to use the streamlined certification application. It DOES NOT automatically certify your credit union as a CDFI. It also does not disqualify your credit union from pursuing a CDFI certification through the standard application. There are three



possible analysis results: *Qualified, Marginal, and Not Qualified*. The meaning of each result is detailed below.

- Qualified: The credit union's loan activity (both number and dollar amount) directed to <u>eligible</u> Target Market counties is at least 60% of its total loan activity. Credit unions that qualify are allowed to bypass some of the CDFI certification application requirements. However, credit unions are still responsible for completing and submitting the streamlined certification application. The CDFI Fund will make the final decision and determine if a credit union is a CDFI certified.
- <u>Marginal</u>: The credit union's loan activity (either number or dollar amount) directed to <u>eligible</u> Target Market counties is between 51% and 59% of its total loan activity. Although these credit unions do not qualify to use the streamlined certification application, the results suggest that these credit unions are on the edge of qualifying and should pursue the CDFI certification application through the standard application.
- <u>Not Qualified:</u> The credit union's loan activity (either number or dollar amount) directed to <u>eligible</u> Target Market counties is less than 51% of its total loan activity. These credit unions do not qualify to use the streamlined certification application. However, these credit unions may still pursue the CDFI certification through the standard application.

12. How will I be notified about the geocode analysis results?

NCUA will notify your credit union of the results by email. If you <u>qualify</u> to use the streamlined certification application, NCUA will provide you with the special application forms that you may submit to the CDFI Fund. If you do not qualify, NCUA will provide a brief summary of the analysis results by email.

13. How long does it take to complete the streamlined application?

The streamlined certification application should only take a few hours to complete.

14. When is the deadline to submit the streamlined application?

The deadline to submit the streamlined certification application to the CDFI Fund is December 31, 2018. However, credit unions that qualify to use the streamlined version are encouraged to submit the application as soon as possible. Credit unions that receive the CDFI certification sooner will be better prepared to apply for Federal awards from the CDFI Fund.



15. Where can I find out more information on the NCUA and CDFI Fund Certification Initiative?

More information about this initiative is available as an archived webinar. To view the webinar, go to the following link: CDFI Certification - More Than One Way to Get There



Program Instructions

This section is a step-by-step instruction guide to help credit unions navigate the process from start to finish.

Before proceeding to complete the participation form, please complete the following activities:

- 1. Prepare your loan files for 2017 loan originations according to the file structure identified on pages 4 and 5 of this document.
- 2. Create an account through NCUA's secure and encrypted email solution, Zixcorp. https://web1.zixmail.net/s/login?b=ncua

Step 1:

Email your loan file to CURECDFI@ncua.gov using the following template for the subject line and body. Please ensure you are sending the message through ZixCorp's secure solution.

Subject: Consent to CDFI Streamlined Application Geocode Analysis

Body: <u>Charter Number</u>

Credit Union Name

Point of Contact Information

If you are unable to successfully register with ZixCorp, please send us an email at CURECDFI@ncua.gov.

Step 2:

Complete the participation form. Open the URL link below to register or sign-on to NCUA's CyberGrants system. The electronic form will be available once you log-in.

Participation Form - Streamlined Certification Application Program

This completes the requirements to participate in the program. You will receive an email confirming that NCUA received your participation form.

If you have any issues, please contact our office at CURECDFI@ncua.gov.



The CDFI Fund's Contact Information

The CDFI Fund's helpdesk contact information for their various services is provided below. Please allow 48 to 72 hours for a response.

For questions that are programmatic in nature (e.g. questions about the certification criteria or how to answer a specific question), e-mail ccme@cdfi.treas.gov.

For questions that are technical and related to using AMIS and the myCDFI Fund system, in particular questions regarding AMIS accounts (e.g. I can't get into my AMIS account, or I'm having technical trouble submitting my CDFI certification application), email amis@cdfi.treas.gov.

The AMIS specific helpdesk contact info and AMIS instruction manuals on the CDFI Fund website are available on this link: https://amis.cdfifund.gov/s/AMISHome.

For non-AMIS technical issues and questions, email ithelpdesk@cdfi.treas.gov.

For questions that are related to the Funding Programs at the CDFI Fund, email the CDFI Help Desk at cdfihelp@cdfi.treas.gov.

Additional helpdesk contact information can be located on the CDFI Fund's website. Follow this link: https://www.cdfifund.gov/pages/contact.aspx.