

Community Development Financial Institutions Fund, Department of the Treasury

Supporting Statement – Part A

Annual Compliance Reports:

Performance Progress Report and Financial Statement Audit Report

OMB Control Number 1559-0050

A. Justification

1. Circumstances necessitating collection of information

Recipients of the Community Development Financial Institutions Program (CDFI Program), the CDFI Rapid Response Program (CDFI RRP), the Native American CDFI Assistance Program (NACA Program), and the Small Dollar Loan Program (SDL Program) submit the Performance Progress Report via the CDFI Fund's AMIS once a year, three (3) months after their Period of Performance end date or fiscal year end. Recipients of the CDFI Program, CDFI RRP, NACA Program, CMF, and SDL Program, and Allocatees of the NMTC Program, also submit the Financial Statement Audit Report via the CDFI Fund's AMIS once a year, six (6) months after their Period of Performance end date or fiscal year end. Recipients and/or Allocatees respond to the questions by providing numerical figures, "yes" or "no" answers, or narrative responses, as appropriate. These reports are used to determine Recipient and/or Allocatees compliance with their Assistance, Award, and/or Allocation Agreement(s) ("Agreements").

The CDFI Fund received a total of seven (7) comments from two (2) organizations on the Performance Progress Report and Financial Statement Audit Report data collection forms. The recommendations received complimented the current functionality of the data collection forms and provided recommendations for enhancement to the data collection forms.

2. Method of collection and use of data

The CDFI Fund will collect the Performance Progress Report and Financial Statement Audit Report data on an annual basis according to the Recipient and/or Allocatees' fiscal year end. The data will be used to determine if a Recipient and/or Allocatee is in compliance with the terms and conditions of its Agreement.

3. Use of Information Technology

The CDFI Fund will collect information electronically and/or use online collaboration tools to reduce burden.

4. Efforts to identify duplication

The CDFI Fund has ensured no similar data is gathered or maintained by the CDFI Fund or is available from other sources known to the CDFI Fund. All of the information requested is required in order to determine if a Recipient and/or Allocatee is in compliance with the terms and conditions of its 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 and/or Allocatees' compliance with their Agreement(s), measure annual performance, or perform program evaluation without this annual collection of this data.

7. Circumstances requiring special information collection

There are no special circumstances.

8. Consultation with Persons outside the Agency

Pursuant to the notice and request for comments published in the *Federal Register* on September 26, 2022, at 87 FR 58433, the CDFI Fund received detailed comments on or before November 26, 2022, from 2 organizations responding to the solicitation for a total of 7 unique comments. The recommendations received complimented the current functionality of the data collection forms and provided recommendations for enhancement to the data collection forms. A response to the comments is included separately with this submission.

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/or Allocatees, 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
CDFI Annual PPR	1,902	1	.75	1,427
CDFI Annual Financial Statement Audit Report (if applicable)	428	1	.5	214
CDFI Annual Single Audit Report (if applicable)	428	1	.5	214

Estimated Annual Reporting Burden				
Total				1,855

13. Estimate of total annual cost burden to respondents

There are no additional capital, start-up or ongoing operational, or maintenance costs associated with information collection. Monetized labor costs are estimated below.

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	1,852	1	1,852	.75	1,389	\$52 ¹	\$72,228
State, Local, and Tribal Governments	50	1	50	.75	38	\$52	\$1,950
Total	1,902	1	1,902		1,427		\$74,178

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 Sector	378	1	378	.5	189	\$52	\$9,828
State, Local, and Tribal Governments	50	1	50	.5	25	\$52	\$1,300
Total	428	1	428		214		\$11,128

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	378	1	378	.5	189	\$52	\$9,828
State, Local, and Tribal Governments	50	1	50	.5	25	\$52	\$1,300
Total	428	1	428		214		\$11,128

14. Estimate of annualized cost to the Government

¹ Bureau of Labor Statistics, Financial Analyst Mean Hourly Wage, May 2022, <http://www.bls.gov/oes/current/oes132051.htm>. Mean Hourly Wage was reported as \$52.30. For purposes of this estimate, this figure has been rounded to \$52.

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 person². 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. The combined annualized cost is thus approximately \$196,000.

15. Any program changes or adjustments

While there are no substantive changes to the information requirements, the estimated time it takes to complete the Performance Progress Report has been increased from 30 to 45 minutes per response, based on a revised assessment. There is also an increase in total burden due to a revised estimate of the number of PPRs being filed based on more recent data, including due to awards made under the Rapid Response Program.

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.

17. Reasons for not displaying expiration date of OMB approval

The expiration date will be displayed.

18. Explanation of exceptions to certification statement

There are no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods

Not applicable as no statistical methods are being used.

² <https://www.fedweek.com/pay-tables/2020-gs-pay-table-washington-baltimore-arlington-dc-md-va-wv-pa/>

