

Appendix A. CY 2024-26 NMTC Program Application PRA - Summary of Public Comments and CDFI Fund Responses

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
1	4/17/2024	St Mary's Center for Women and Children	Alexis Steel	Community Outcomes	Application	Commitment to Areas of Higher Distress	Concerns about changes to Question 25(b).	The CDFI Fund will consider changes in future application rounds.
2	4/23/2024	Evernorth Rural Ventures	Beth Boutin	Community Outcomes	Application	Community Accountability & Involvement	Delete new bullet asking about use of data or suggest alternate wording because it disadvantages rural CDEs or CDEs that serve rural areas.	The CDFI Fund will consider additional guidance based on this comment.
3	4/23/2024	Evernorth Rural Ventures	Beth Boutin	Community Outcomes	Application	LILA/Healthy Foods	Revert back to the Healthy Food Financing Initiative (HFFI) definition.	The CDFI Fund is maintaining the current requirements.
4	4/23/2024	Evernorth Rural Ventures	Beth Boutin	Community Outcomes	Application	Medically Underserved Areas	Suggest adding Medically Underserved Population to Medically Underserved Areas designated by HRSA.	The CDFI Fund will consider changes in future application rounds.
5	4/23/2024	Evernorth Rural Ventures	Beth Boutin	Community Outcomes	Application	Medically Underserved Areas	Support adding Healthcare Professional Shortage Areas (HPSAs). Recommend clarifying types of care projects will increase availability for.	The CDFI Fund made revisions based on public comments.
6	4/23/2024	Evernorth Rural Ventures	Beth Boutin	Community Outcomes	Application	Commitment to Areas of Higher Distress	Suggest alternate changes to Question 25(b).	The CDFI Fund made revisions based on public comments.
7	4/23/2024	Evernorth Rural Ventures	Beth Boutin	Community Outcomes	Application	Quality Jobs	Remove requirement to discuss temporary/construction jobs for "Quality Jobs."	The CDFI Fund is maintaining the current requirements.

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8	4/23/2024	Evernorth Rural Ventures	Beth Boutin	Community Outcomes	Application	Community Goods and Services	Exempt MCOS projects from providing third-party metrics.	The CDFI Fund is maintaining the current requirements.
9	4/23/2024	Evernorth Rural Ventures	Beth Boutin	Community Outcomes	Application	Community Goods and Services	Remove third-party metrics requirement for community goods and services.	The CDFI Fund is maintaining the current requirements.
10	4/23/2024	Evernorth Rural Ventures	Beth Boutin	Community Outcomes	Application	Track Record Alignment with Community or Eco Dev Strategies	Restore previous Question 27(c) track record of alignment with Community or economic development strategies.	The CDFI Fund will consider changes in future application rounds.
11	4/23/2024	Evernorth Rural Ventures	Beth Boutin	Capitalization Strategy	Application	Investor Letters	Clarify when a prior allocatee is required to provide investor letters.	The CDFI Fund made revisions based on public comments.
12	4/23/2024	Evernorth Rural Ventures	Beth Boutin	Capitalization Strategy	Application	Investor Letters	Confirm that document is only required per Question 37(a).	The CDFI Fund made revisions based on public comments.
13	4/23/2024	Evernorth Rural Ventures	Beth Boutin	Exhibits	Application	Business Type	Add "childcare" as business type in Table A5.	The CDFI Fund will consider additional guidance based on this comment.
14	4/23/2024	Evernorth Rural Ventures	Beth Boutin	Management Capacity	Application	Management Experience	Revert changes in character limits within the Management Capacity section.	The CDFI Fund made revisions based on public comments.

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15	4/23/2024	Evernorth Rural Ventures	Beth Boutin	Glossary of Terms	Application	Disadvantage Business	Support inclusion of nonprofit businesses but want to maintain "a business that has inadequate access to investment capital." Alternately suggest "a business that has inadequate access to conventional investment capital."	The CDFI Fund made revisions based on public comments.
16	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	Business Strategy	Application	Innovative Investments	Clarify in FAQ that Question 19 does not impact scoring.	The CDFI Fund will consider changes in future application rounds.
17	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	Business Strategy	Application	Innovative Investments	Increase character limit for Question 19 narrative when multiple innovative activities are selected.	The CDFI Fund will consider additional guidance based on this comment.
18	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	Business Strategy	FAQ	Innovative Investments	Add new FAQ to clarify that advanced loan purchases qualify as investments in QALICBs.	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
19	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	Business Strategy	Application	Track Record of Investments	Allow individual experience to be included in Question 21 and scored in Phase 1.	The CDFI Fund is maintaining the current requirements.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
20	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	Community Outcomes	Application	Persistent Poverty Counties	Add "Persistent Poverty Census Tracts" to Question 25(b).	The CDFI Fund is maintaining the current requirements.
21	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	Community Outcomes	Application	New Community Outcomes Category	Add "Other" back as a community outcome category in Question 26(a).	The CDFI Fund will consider changes in future application rounds.
22	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	Community Outcomes	Application	New Community Outcomes Category	Add "Microlending and Nonprofit Support" as a new community outcome in Question 26(a).	The CDFI Fund is maintaining the current requirements.
23	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	Capitalization Strategy	Application	Track Record of Raising Capital	Restore Question 35 as one question.	The CDFI Fund made revisions based on public comments.
24	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	Previous Awards	Application	Prior NMTC Investments	Clarify instructions for Question 44(a) through FAQ# 133.	The CDFI Fund will consider additional guidance based on this comment.
25	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	Business Strategy	Application	Financial Products	Remove requirement to list percentage of financial products when more than one financial product is offered.	The CDFI Fund is maintaining the current requirements.
26	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	Business Strategy	Application	Additional Flexibility for Debt	Correct typo in Question 15(a).	The CDFI Fund made revisions based on public comments.
27	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	Business Strategy	Application	Track Record of Investments	Revert change to Question 20(c) back to numerical.	The CDFI Fund made revisions based on public comments.

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28	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	Business Strategy	Application	Track Record of Investments	Allow the Controlling Entity to report discrete NMTC activities as opposed to all activities.	The CDFI Fund is maintaining the current requirements.
29	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	Business Strategy	Application	Track Record of Investments	Revert change to Question 21(c) back to numerical.	The CDFI Fund made revisions based on public comments.
30	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	Community Outcomes	Application	Federal/State/Local Zones	Restore "federal/state/local zones" as an area of distress.	The CDFI Fund is maintaining the current requirements.
31	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	Community Outcomes	Application	Persistent Poverty Counties	Add "Persistent Poverty Census Tracts" to Question 25(b).	The CDFI Fund is maintaining the current requirements.
32	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	Community Outcomes	Application	LILA/Healthy Foods	Revert back to the Healthy Food Financing Initiative (HFFI) definition.	The CDFI Fund is maintaining the current requirements.
33	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	Community Outcomes	Application	Medically Underserved Areas	Support adding Healthcare Professional Shortage Areas (HPSAs) but request that the CDFI Fund clarify qualified projects. Suggest adding Medically Underserved Population to Medically Underserved Areas designated by HRSA.	The CDFI Fund made revisions based on public comments.
34	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	Community Outcomes	Application	Commitment to Areas of Higher Distress	Revert changes to Question 25(b). Suggest moving question to Innovative Activity.	The CDFI Fund made revisions based on public comments.

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35	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	Community Outcomes	Application	Quality Jobs	Clarify the definition of "Quality Jobs."	The CDFI Fund will consider additional guidance based on this comment.
36	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	Community Outcomes	Application	Quality Jobs	Remove requirement to discuss temporary/construction jobs for "Quality Jobs."	The CDFI Fund is maintaining the current requirements.
37	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	Community Outcomes	Application	Accessible Jobs	Change the "limited language proficiency" reference to "limited English language proficiency" for Accessible Jobs	The CDFI Fund made revisions based on public comments.
38	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	Community Outcomes	Application	Community Goods and Services	Remove third-party metrics requirement for community goods and services.	The CDFI Fund is maintaining the current requirements.
39	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	Community Outcomes	Application	Housing	Update the language in affordable housing to also specify the percentage that is considered low income.	The CDFI Fund made revisions based on public comments.
40	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	Community Outcomes	Application	Community Accountability & Involvement	Using data to qualify need would disadvantage LICs and Native communities	The CDFI Fund will consider additional guidance based on this comment.
41	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	Community Outcomes	Application	Community Accountability & Involvement	Proposed alternate wording to qualify "data" used to demonstrate need.	The CDFI Fund will consider additional guidance based on this comment.
42	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	Community Outcomes	Application	Community Accountability & Involvement	Clarify if we are looking for engagement directly with LIPs/LIC residents or with stakeholders.	The CDFI Fund will consider additional guidance based on this comment.

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43	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	Community Outcomes	Application	Community Accountability & Involvement	Revert changes to Question 27(c) to discuss track record.	The CDFI Fund will consider changes in future application rounds.
44	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	Management Capacity	Application	Key Personnel	Rephrase term "subordinates."	The CDFI Fund made revisions based on public comments.
45	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	Management Capacity	Application	Organization Capacity/Key Personnel	Propose no or modest decrease to character limit in Question 31(b).	The CDFI Fund made revisions based on public comments.
46	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	Management Capacity	Application	Fee Structure	Clarify if Applicants should include fees that are conditional or contingent.	The CDFI Fund will consider additional guidance based on this comment.
47	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	Business Strategy	Application	Maximize Efficiency and Financial Impact	Add new question in Business Strategy to discuss Applicant's strategy to maximize efficiency and financial impact.	The CDFI Fund will consider changes in future application rounds.
48	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	Exhibits	Application	Total QEI from Unaffiliated CDEs	Change Row J to "Estimated Total QEIs from unaffiliated CDEs."	The CDFI Fund will consider additional guidance based on this comment.
49	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	Exhibits	Application	Fee Structure	Increase character limit to "Description of the Fee" field in Table D2.	The CDFI Fund will consider additional guidance based on this comment.
50	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	Glossary of Terms	Application	Enforcement Action Definition	Add "formal" to glossary term.	The CDFI Fund made revisions based on public comments.

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51	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	Glossary of Terms	Application	Minority Owned or Controlled Definition	Propose changes to "Minority-owned or Minority-controlled."	The CDFI Fund will consider changes in future application rounds.
52	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	General	Review Process	Scoring Process	Various ideas for increasing scoring variability.	The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
53	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	NOAA	NOAA	CDE Certification	Concerns/suggestions regarding requiring CDEs be certified by the NOAA publication date.	The CDFI Fund is maintaining the current requirements.
54	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	Glossary of Terms	IT Enhancement	Online Application Portal	Suggest IT enhancement to display glossary term within online Application.	The CDFI Fund will consider additional guidance based on this comment.
55	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	Post Award	Compliance	General Consistency	Update Compliance FAQ to clarify that CDES will not be evaluated unfavorably if no more than 15% of their allocation is used to finance investments inconsistent w/ its application strategy.	This comment is related to Allocatee reporting/compliance and will be considered in the future.
56	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	Post Award	Debriefing	Debriefing	Give more robust feedback in debriefing.	The CDFI Fund will consider ways to provide more detailed information in the debriefing document for unsuccessful applicants.

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57	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	Glossary of Terms	Application	Disadvantage Business	Oppose <\$100,000 revenue limitation.	The CDFI Fund made revisions based on public comments.
58	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	General	Application Instructions, FAQ	Integrate Application Material	Add Notice of Allocation Availability (NOAA) to online Application. Incorporate FAQ guidance into Application Notes.	The CDFI Fund will consider additional guidance based on this comment.
59	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	NOAA	NOAA	QEI Issuance Requirements	Reduce QEI issuance threshold requirement for non-rural CDEs from 20% to 0%.	The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
60	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	Glossary of Terms	Application	Disadvantage Business	Clarify "primarily" in part 4 of definition revision; clarification on whether businesses need to be in LICs before or after investment; add non-profit and socially disadvantaged persons to part 2.	The CDFI Fund made revisions based on public comments.
61	4/23/2024	NMTC Working Group - Novogradac	Brad Elphick	Management Capacity	Application	Fee Structure	Make sure fee guidance is consistent between Question 43 and the CDE's fee disclosure.	The CDFI Fund will consider changes in future application rounds.
62	4/23/2024	CAHEC Community Capital	Brian Oxford	Community Outcomes	Application	Question Note	Clarify percentage of commitments in Questions 25(a) and (b).	The CDFI Fund made revisions based on public comments.
63	4/23/2024	CAHEC Community Capital	Brian Oxford	Business Strategy	Application	Financial Products	Support comparing NMTC product with other financial institutions or investors.	Comment in support of proposed or existing text. No action necessary.

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64	4/23/2024	CAHEC Community Capital	Brian Oxford	Business Strategy	Application	Additional Flexibility for Debt	Correct typo in Question 15(a).	The CDFI Fund made revisions based on public comments.
65	4/23/2024	CAHEC Community Capital	Brian Oxford	Business Strategy	Application	Question Note Third Paragraph	Clarify level of specificity required for business type description in Question 17(c).	The CDFI Fund made revisions based on public comments.
66	4/23/2024	CAHEC Community Capital	Brian Oxford	Business Strategy	Application	Question Note First Paragraph	Clarify level of specificity required for business type description in Question 17(c).	The CDFI Fund made revisions based on public comments.
67	4/23/2024	CAHEC Community Capital	Brian Oxford	Community Outcomes	Application	Commitment to Areas of Higher Distress	Suggest moving question to Innovative Activity.	The CDFI Fund is maintaining the current requirements.
68	4/23/2024	CAHEC Community Capital	Brian Oxford	Community Outcomes	Application	Commitment to Areas of Higher Distress	Concerns with tracking commitments to areas of distress.	The CDFI Fund will consider additional guidance based on this comment.
69	4/23/2024	CAHEC Community Capital	Brian Oxford	Community Outcomes	Application	Commitment to Areas of Higher Distress	Concerns with revised areas of distress.	The CDFI Fund made revisions based on public comments.
70	4/23/2024	CAHEC Community Capital	Brian Oxford	Community Outcomes	Application	Community Goods and Services	Remove third-party metrics requirement for community goods and services.	The CDFI Fund is maintaining the current requirements.
71	4/23/2024	CAHEC Community Capital	Brian Oxford	Community Outcomes	Application	Community or Economic Development Strategies	Revise wording or clarify instructions for Question 27(d) to "discuss the portion...."	The CDFI Fund will consider additional guidance based on this comment.

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72	4/23/2024	CAHEC Community Capital	Brian Oxford	Capitalization Strategy	Application	Part IV instructions	Correct typo in Part IV description.	The CDFI Fund made revisions based on public comments.
73	4/23/2024	CAHEC Community Capital	Brian Oxford	Management Capacity	Application	Consistency of Personnel Names	Clarify if names in Table C2 and Question 28(a) should be identical to Question 28(b).	The CDFI Fund made revisions based on public comments.
74	4/23/2024	CAHEC Community Capital	Brian Oxford	Exhibits	Application	Add "Project Name" answer field	Add a separate answer field for project name.	The CDFI Fund will consider changes in future application rounds.
75	4/23/2024	CAHEC Community Capital	Brian Oxford	Combined Rounds	NOAA	Combining Rounds	Do not support combining CY 2024 & CY 2025 rounds.	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
76	4/23/2024	CAHEC Community Capital	Brian Oxford	Glossary of Terms	Application	Disadvantage Business	Revert definition of "Disadvantage Business."	The CDFI Fund made revisions based on public comments.
77	4/23/2024	CAHEC Community Capital	Brian Oxford	General	Review Process	Phase 1 reviewers	Revert back to three reviewers for Phase 1 review.	The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.

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78	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Allocation Request	Application	Total QEI Needs	Aligning allocation request with total QEI is more consistent and realistic.	Comment in support of proposed or existing text. No action necessary.
79	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Allocation Request	Application	Total QEI Needs	Describing detailed investment strategy based on community input increase burden.	The CDFI Fund is maintaining the current requirements.
80	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Business Strategy	Application	Due Diligence	Due diligence documentation requires applicants to maintain extensive records which may exceed the assumed preparation hours.	The CDFI Fund is maintaining the current requirements.
81	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Business Strategy	Application	Due Diligence	Provide checklist for due diligence.	The CDFI Fund will consider additional guidance based on this comment.
82	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Business Strategy	Application	Due Diligence	Support changes to Question 18.	Comment in support of proposed or existing text. No action necessary.
83	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Community Outcomes	Application	Community Accountability & Involvement	Describing the involvement of LIC representatives takes time.	The CDFI Fund is maintaining the current requirements.
84	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Business Strategy	Application	Financial Products	Articulate distinction between descriptions for multiple financial products. Provide examples.	The CDFI Fund will consider additional guidance based on this comment.

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85	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Business Strategy	Application	Financial Products	Support requiring distinct narratives for financial products.	Comment in support of proposed or existing text. No action necessary.
86	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Business Strategy	Application	Financial Products	Providing distinct narratives for each financial product and detailed description of product structuring increases burden and cost to prepare application.	The CDFI Fund will consider additional guidance based on this comment.
87	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Business Strategy	Application	Financial Products	Requirement to describe circumstances dictating rates and terms adds burden.	The CDFI Fund will consider additional guidance based on this comment.
88	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Business Strategy	Application	Financial Products	Provide example or template for Question 14(b). Simplify requirements or provide calculation tools.	The CDFI Fund will consider additional guidance based on this comment.
89	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Business Strategy	Application	Financial Products	Describing circumstances of terms and rates increase burden.	The CDFI Fund will consider additional guidance based on this comment.
90	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Business Strategy	Application	Invest in Other CDEs	Revert changes to instructions for Question 14(c).	The CDFI Fund is maintaining the current requirements.
91	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Business Strategy	Application	Invest in Other CDEs	Provide an example for how benefits are passed on when investing in other CDEs.	The CDFI Fund will consider additional guidance based on this comment.

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92	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Business Strategy	Application	Align Investment with Community Input	Explain criteria used to assess the quality and alignment of community input with investment strategies.	The CDFI Fund will consider additional guidance based on this comment.
93	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Business Strategy	Application	Align Investment with Community Input	Support changes to Question 17(c).	Comment in support of proposed or existing text. No action necessary.
94	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Community Outcomes	Application	Align Investment with Community Input	Detailing investment strategies based on community input could further increase burden.	The CDFI Fund will consider additional guidance based on this comment.
95	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Community Outcomes	IT Enhancement	Commitment to Areas of Higher Distress	Provide mapping tool or database for qualified distressed areas.	The CDFI Fund will consider changes in future application rounds.
96	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Community Outcomes	Application	Commitment to Areas of Higher Distress	Provide guideline, scoring rubric and scoring metric for Question 25(b).	The CDFI Fund will consider additional guidance based on this comment.
97	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Community Outcomes	Application	Commitment to Areas of Higher Distress	Analyzing data on areas of distress will increase costs.	The CDFI Fund will consider additional guidance based on this comment.
98	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Community Outcomes	Application	Commitment to Areas of Higher Distress	Commitment to invest in specific distress areas increase admin burden and costs.	The CDFI Fund will consider additional guidance based on this comment.

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99	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Community Outcomes	Application	Commitment to Areas of Higher Distress	Commitment to invest in specific distress areas increase admin burden and costs.	The CDFI Fund will consider additional guidance based on this comment.
100	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Community Outcomes	IT Enhancement	Community Accountability & Involvement	Request for questions to be reformatted or add a table.	The CDFI Fund will consider changes in future application rounds.
101	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Community Outcomes	Application	Community Accountability & Involvement	Consider updates to allow more flexibility in how accountability, engagement and involvement is demonstrated.	The CDFI Fund will consider additional guidance based on this comment.
102	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Management Capacity	Application	Organization Capacity/Key Personnel	Ensure consideration is not limited to experienced CDEs.	The CDFI Fund is maintaining the current requirements.
103	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Management Capacity	Application	Organization Capacity/Key Personnel	Incorporate dropdown menus or autofill options based on prior year submissions to minimize repetitive data entry.	The CDFI Fund will consider additional guidance based on this comment.
104	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Management Capacity	Application	Organization capacity/Key Personnel	Support collecting detailed descriptions of org structure, key personnel and experience providing QLICIs.	Comment in support of proposed or existing text. No action necessary.
105	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Management Capacity	Application	Organization capacity/Key Personnel	Information required adds complexity requiring additional resources. This will increase operational costs.	The CDFI Fund will continue its efforts to reduce burden in future application rounds.

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106	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Management Capacity	Application	Organization Capacity/Key Personnel	Provide clarification on expectations for key personnel.	The CDFI Fund will consider additional guidance based on this comment.
107	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Management Capacity	Application	Organization Capacity/Key Personnel	Provide clarification on expectations for key personnel.	The CDFI Fund will consider additional guidance based on this comment.
108	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Capitalization Strategy	Application	Raising Capital	Consider incorporating CDE overarching goals and impact into strategy/track record of raising capital.	The CDFI Fund will consider changes in future application rounds.
109	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Capitalization Strategy	Application	Capitalization	Add or integrate digital templates for these questions.	The CDFI Fund will consider changes in future application rounds.
110	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Capitalization Strategy	Application	Raising Capital	Documenting track record of capital raising and investment partnership is challenging and could increase cost.	The CDFI Fund will continue its efforts to reduce burden in future application rounds.
111	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Capitalization Strategy	Application	Raising Capital	Do not focus exclusively on ability or track record of raising capital. Add consideration for CDFI/CDEs and Minority CDEs that demonstrate growth potential and community impact.	The CDFI Fund is maintaining the current requirements.
112	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Business Strategy	Application	Innovation in financial product	Provide space for CDEs to discuss any innovative features of their financial products.	The CDFI Fund will consider changes in future application rounds.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
113	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	AMIS	IT Enhancement	Online Application Portal	Suggest various format updates, functionality improvements to the online application interface for Applicants.	The CDFI Fund will consider additional guidance based on this comment.
114	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Post Award	Debriefing	Debriefing	Give more robust feedback in debriefing.	The CDFI Fund will consider ways to provide more detailed information in the debriefing document for unsuccessful applicants.
115	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Estimated Hours of Burden	PRA	CDFI Fund Burden Estimate (hours)	Review and potentially increase burden estimate.	The CDFI Fund will continue its efforts to reduce burden in future application rounds.
116	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Capitalization Strategy	Application	Raising Capital	Describing history and strategies to raise capital require additional expertise/burden.	The CDFI Fund will continue its efforts to reduce burden in future application rounds.
117	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Provide Feedback	PRA	Review Draft Application	Various ideas for providing feedback, financial rewards, or advantages to certain Applicants.	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
118	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Customer Service	Capacity Building	Consistency of Personnel Names	Conduct research to review participation and successes of Minority CDEs and understand barriers to entry and success.	The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
119	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Provide Feedback	PRA	Review Draft Application	Allow early access to application drafts and provide feedback allowing Applicants to revisit their responses.	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
120	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Estimated Hours of Burden	PRA	CDFI Fund Burden Estimate (hours)	Current burden estimate may underrepresent true cost of burden.	The CDFI Fund will continue its efforts to reduce burden in future application rounds.
121	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Community Outcomes	Application	Align Investment with Community Input	Substantiating impacts for LICs/LIPs increase burden.	The CDFI Fund will consider additional guidance based on this comment.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
122	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Provide Feedback	PRA	Review Draft Application	Allow early access to application drafts and provide feedback allowing Applicants to revisit their responses.	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
123	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Customer Service	Capacity Building	Provide Technical Assistance	Develop partnerships with organizations to provide capacity building assistance for Minority CDEs.	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
124	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Management Capacity	Application	Organization Capacity/Key Personnel	Detailed information requested may increase burden for new Applicants or those with recent structural changes.	The CDFI Fund will continue its efforts to reduce burden in future application rounds.
125	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Capitalization Strategy	Application	Raising Capital	Request for additional instructions and guidance regarding data reported and sharing preferred format for Commitment Letters and Letters of Intent.	The CDFI Fund will consider additional guidance based on this comment.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
126	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Business Strategy	Application	Sustainability and Viability of Investments	Add a question that encourages CDEs to discuss their strategies for ensuring the sustainability and long-term viability of their investments (reinvestments, additional capital, lasting benefits).	The CDFI Fund will consider changes in future application rounds.
127	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Business Strategy	Application	Social & economic Impact	Add a question focused on anticipated social and economic impact of the proposed investments.	The CDFI Fund is maintaining the current requirements.
128	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	General	Regulations	Set-Aside	Create a set aside for Minority CDEs.	The CDFI Fund does not have statutory authority to implement this recommendation.
129	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Customer Service	Capacity Building	Provide Technical Assistance	Provide technical assistance to Minority CDEs.	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
130	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Community Outcomes	Review Process	Bonus Points	Give bonus points for CDFIs.	The CDFI Fund does not have statutory authority to implement this recommendation.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
131	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	General	Review Process	Minority-led CDEs	Revise review process to evaluate experience and performance of Minority CDEs.	The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
132	4/23/2024	Chicago Community Loan Fund	Calvin Holmes	Business Strategy	Application	Total QEI Needs	Request calculator tool to align QEI needs with business type.	The CDFI Fund will consider changes in future application rounds.
133	4/23/2024	Urban Action Community Development	Carl Struever	Community Outcomes	Application	MBE/WBE business	Consider adding MBE/WBE participation.	The CDFI Fund will consider changes in future application rounds.
134	4/23/2024	Urban Action Community Development	Carl Struever	Community Outcomes	Application	Catalytic Impact in Neighborhood Transformation	Restore question about "catalytic impact."	The CDFI Fund will consider additional guidance based on this comment.
135	4/23/2024	Urban Action Community Development	Carl Struever	Management Capacity	Application	Fee Structure	Support requirement to disclose fees.	Comment in support of proposed or existing text. No action necessary.
136	4/23/2024	Urban Action Community Development	Carl Struever	General	Application	NMTC Pricing	Propose ways to increase NMTC pricing.	The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
137	4/23/2024	Urban Action Community Development	Carl Struever	Community Outcomes	Application	Commitment to Areas of Higher Distress	Distress criteria does not consider collapse of offices and commercial properties in downtowns.	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
138	4/23/2024	Urban Action Community Development	Carl Struever	Community Outcomes	Application	Commitment to Areas of Higher Distress	Do not support targeting "deep distress"	The CDFI Fund made revisions based on public comments.
139	4/23/2024	Urban Action Community Development	Carl Struever	General	Application	Reduce Cost	Suggested alternates to escrowed funds.	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
140	4/23/2024	Urban Action Community Development	Carl Struever	General	Other	Expand Eligible Leverage Loan Sources	Expand sources of leverage loans.	The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
141	4/23/2024	Urban Action Community Development	Carl Struever	General	Other	Fee Structure	Expressed concern about escrowing asset management fees.	The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
142	4/23/2024	Urban Action Community Development	Carl Struever	Regulation	Other	Financial Products	Structure "put" as a loan at the initial NMTC investment.	The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
143	4/23/2024	Urban Action Community Development	Carl Struever	General	Other	Reduce Cost	Made suggestions to reduce transaction cost.	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
144	4/23/2024	Urban Action Community Development	Carl Struever	General	Federal Coordination	Streamline NMTC with Federal programs	Minimize requirements from other federal and public programs to maximize impact of NMTC.	The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
145	4/23/2024	Urban Action Community Development	Carl Struever	General	Federal Coordination	Reference Justice40 White House Initiative	Make references to Justice40 (White House Initiative).	The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
146	4/23/2024	Urban Action Community Development	Carl Struever	General	Application	Environmental Impact	Utilize language from other federal programs to generate environmental impact.	The CDFI Fund will consider changes in future application rounds.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
147	4/23/2024	Urban Action Community Development	Carl Struever	General	Other	Potential Impact	Use NMTC as vehicles for "defense dividend", local and state using federal/defense investments to grow local economy.	The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
148	4/23/2024	Urban Action Community Development	Carl Struever	General	Other	Fee Structure	Cost of fees, bridge loans, and escrowed accounts devalues benefits of NMTC.	The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
291	4/23/2024	The Rose Urban Green Fund	Charles Perry	Community Outcomes	Application	Federal/State/Local Zones	Restore "federal/state/local zones" as an area of distress.	The CDFI Fund is maintaining the current requirements.
150	4/23/2024	The Rose Urban Green Fund	Charles Perry	Community Outcomes	Application	Commitment to Areas of Higher Distress	Revert changes to Question 25(b).	The CDFI Fund made revisions based on public comments.
151	4/23/2024	The Rose Urban Green Fund	Charles Perry	Glossary of Terms	Application	Disadvantage Business	Revert definition of "Disadvantage Business" or add nonprofit businesses servicing LIC residents and LIPs.	The CDFI Fund made revisions based on public comments.
152	4/23/2024	National New Markets Fund	Deborah La Franchi	Business Strategy	Application	Market Comparison	Support comparing NMTC product with other financial institutions or investors.	Comment in support of proposed or existing text. No action necessary.
153	4/23/2024	National New Markets Fund	Deborah La Franchi	Business Strategy	Application	Proposed Pipeline	Clarify whether deployment timeline is required. Add project readiness and financing status to Question 17(c) text or question note.	The CDFI Fund is maintaining the current requirements.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
154	4/23/2024	National New Markets Fund	Deborah La Franchi	Business Strategy	Application	Due Diligence	Increase character limit for Question 18.	The CDFI Fund made revisions based on public comments.
155	4/23/2024	National New Markets Fund	Deborah La Franchi	Business Strategy	Application	Track Record of Investments	Allow Applicants to report their track record, and not their Controlling Entity's.	The CDFI Fund is maintaining the current requirements.
156	4/23/2024	National New Markets Fund	Deborah La Franchi	Community Outcomes	Application	Commitment to Areas of Higher Distress	Add "Persistent Poverty Counties" to Question 25b.	The CDFI Fund is maintaining the current requirements.
157	4/23/2024	National New Markets Fund	Deborah La Franchi	Community Outcomes	Application	Commitment to Areas of Higher Distress	Revert changes to Question 25(b).	The CDFI Fund made revisions based on public comments.
158	4/23/2024	National New Markets Fund	Deborah La Franchi	Community Outcomes	Application	Commitment to Areas of Higher Distress	Remove "higher" or quantify "higher" in Question 25(b).	The CDFI Fund made revisions based on public comments.
159	4/23/2024	National New Markets Fund	Deborah La Franchi	Exhibits	Application	Track Record of Investments	Support allowing applicants to report their track record, and not their Controlling Entity's.	Comment in support of proposed or existing text. No action necessary.
160	4/23/2024	National New Markets Fund	Deborah La Franchi	Management Capacity	Application	Fee Structure	Support requirement to disclose fees.	Comment in support of proposed or existing text. No action necessary.
161	4/23/2024	National New Markets Fund	Deborah La Franchi	Glossary of Terms	Application	Disadvantage Business	Align definition of "Disadvantage Business" with SBA.	The CDFI Fund made revisions based on public comments.

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162	4/18/2024	Optus Bank	Dominik Mjartan	Post Award	Debriefing	Debriefing	Give detailed scoring in debriefing.	The CDFI Fund will consider ways to provide more detailed information in the debriefing document for unsuccessful applicants.
163	4/18/2024	Optus Bank	Dominik Mjartan	Community Outcomes	Review Process	Bonus Points	Give bonus points for CDFIs.	The CDFI Fund does not have statutory authority to implement this recommendation.
164	4/18/2024	Optus Bank	Dominik Mjartan	Post Award	Debriefing	Debriefing	Give detailed comments in debriefing.	The CDFI Fund will consider ways to provide more detailed information in the debriefing document for unsuccessful applicants.
165	4/17/2024	Smith NMTC Associates	Donna Aronoff Smith	Community Outcomes	Application	Community Engagement	Question on community engagement implies engagement with local residents and/or local economic development agencies, which create burden for CDEs serving a national or large service area.	The CDFI Fund will consider additional guidance based on this comment.
166	4/17/2024	Smith NMTC Associates	Donna Aronoff Smith	Business Strategy/Community Outcome	Application	Housing	Add high housing need as severe distress criteria or innovative activities.	The CDFI Fund will consider changes in future application rounds.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
167	4/17/2024	Smith NMTC Associates	Donna Aronoff Smith	Community Outcomes	Application	Commitment to Areas of Higher Distress	Revert changes to Question 25(b).	The CDFI Fund made revisions based on public comments.
168	4/17/2024	Smith NMTC Associates	Donna Aronoff Smith	Community Outcomes	Application	Housing	Increase character limit to Question 26(a)(8).	The CDFI Fund will consider changes in future application rounds.
169	4/17/2024	Smith NMTC Associates	Donna Aronoff Smith	Glossary of Terms	Application	Disadvantage Business	Revert definition of "Disadvantage Business" or add nonprofit businesses servicing LIC residents and LIPs.	The CDFI Fund made revisions based on public comments.
170	4/17/2024	Smith NMTC Associates	Donna Aronoff Smith	NOAA	NOAA	QEI Issuance Requirements	Reduce QEI issuance threshold requirement for non-rural CDEs from 20% to 0%.	The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
171	4/23/2024	504 Corporation/Advance CapAccess (ACA)	Dwayne Lee	Community Outcomes	Application	Commitment to Areas of Higher Distress	Revert changes to Question 25(b).	The CDFI Fund made revisions based on public comments.
172	4/23/2024	504 Corporation/Advance CapAccess (ACA)	Dwayne Lee	Glossary of Terms	Application	Disadvantage Business	Revert definition of "Disadvantage Business."	The CDFI Fund made revisions based on public comments.
173	4/23/2024	Homeownership Alliance	Elizabeth Coats	Business Strategy/Community Outcome	Application	Housing	Add high housing need as severe distress criteria or innovative activities.	The CDFI Fund will consider changes in future application rounds.

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174	4/23/2024	Homeownershi p Alliance	Elizabeth Coats	Community Outcomes	Application	Commitment to Areas of Higher Distress	Revert changes to Question 25(b).	The CDFI Fund made revisions based on public comments.
175	4/23/2024	Homeownershi p Alliance	Elizabeth Coats	Community Outcomes	Application	Housing	Increase character limit to Question 26(a)(8).	The CDFI Fund will consider changes in future application rounds.
176	4/23/2024	Homeownershi p Alliance	Elizabeth Coats	General	Review Process	External Reviewers	Hire external reviewers with housing experience.	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
177	4/23/2024	Homeownershi p Alliance	Elizabeth Coats	FAQ	Application Instructions	Housing	Incorporate housing examples in Phase 1 training & FAQ.	The CDFI Fund will consider additional guidance based on this comment.
178	4/23/2024	Michigan Community Capital	Eric Hanna	Community Outcomes	Application	Community Accountabilit y & Involvement	Revert changes to Question 27(c) to discuss track record.	The CDFI Fund will consider changes in future application rounds.
179	4/23/2024	Michigan Community Capital	Eric Hanna	Capitalizati on Strategy	Application	Capitalization	Restore Question 35 as one question.	The CDFI Fund made revisions based on public comments.
180	4/23/2024	Michigan Community Capital	Eric Hanna	Community Outcomes	Application	LILA/Healthy Foods	Revert back to the Healthy Food Financing Initiative (HFFI) definition.	The CDFI Fund is maintaining the current requirements.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
181	4/23/2024	Michigan Community Capital	Eric Hanna	Community Outcomes	Application	Commitment to Areas of Higher Distress	Suggest alternate changes to Question 25(b).	The CDFI Fund made revisions based on public comments.
182	4/23/2024	Michigan Community Capital	Eric Hanna	Community Outcomes	Application	Commitment to Areas of Higher Distress	Revert changes to Question 25(b).	The CDFI Fund made revisions based on public comments.
183	4/23/2024	Michigan Community Capital	Eric Hanna	Business Strategy	Application	Maximize Efficiency and Financial Impact	Add new question in Business Strategy to discuss Applicant's strategy to maximize efficiency and financial impact.	The CDFI Fund will consider changes in future application rounds.
184	4/23/2024	Michigan Community Capital	Eric Hanna	Community Outcomes	Review Process	Bonus Points	Give bonus points to CDFIs as Applicants or Controlling Entities.	The CDFI Fund does not have statutory authority to implement this recommendation.
185	4/18/2024	Dallas Development Fund	Heather Lepaska	Community Outcomes	Application	Commitment to Areas of Higher Distress	Revert changes to Question 25(b).	The CDFI Fund made revisions based on public comments.
186	4/23/2024	Confederated Tribes of the Colville Reservation	Jarred-Michael Erickson	Community Outcomes	Application	Federal Native Areas	Support wording change to "Federal Native Areas."	Comment in support of proposed or existing text. No action necessary.
187	4/23/2024	Confederated Tribes of the Colville Reservation	Jarred-Michael Erickson	Community Outcomes	Application	Community Accountability & Involvement	Adopt holistic definition of data in Question 27(b).	The CDFI Fund will consider additional guidance based on this comment.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
188	4/23/2024	Community Development Bankers Association	Jeannine Jacokes	Business Strategy	Application	Due Diligence	Provide some additional flexibility for Applicants when responding to this question.	The CDFI Fund is maintaining the current requirements.
189	4/23/2024	Community Development Bankers Association	Jeannine Jacokes	Business Strategy	Application	Innovative Investments	Support adding 'Investing in Unrelated Minority-owned or Native American-owned or controlled CDEs.'	Comment in support of proposed or existing text. No action necessary.
190	4/23/2024	Community Development Bankers Association	Jeannine Jacokes	Community Outcomes	Application	Commitment to Areas of Higher Distress	Concerns that new distress areas may not accurately reflect need due to data limitations and may result in incentivizing different outcomes than what's desired.	The CDFI Fund made revisions based on public comments.
191	4/23/2024	Community Development Bankers Association	Jeannine Jacokes	Community Outcomes	Application	Community Goods and Services	Remove third-party metrics requirement for community goods and services.	The CDFI Fund is maintaining the current requirements.
192	4/23/2024	Community Development Bankers Association	Jeannine Jacokes	Community Outcomes	Application	Community Accountability & Involvement	Using data to qualify need would disadvantage LICs and Native communities	The CDFI Fund will consider additional guidance based on this comment.
193	4/23/2024	Community Development Bankers Association	Jeannine Jacokes	Community Outcomes	Application	LIC Involvement in Past Investments	The CDFI Fund should be more flexible in its evaluation until the impacts of the change in Question 27(b) are fully understood.	The CDFI Fund is maintaining the current requirements.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
194	4/23/2024	Community Development Bankers Association	Jeannine Jacokes	Management Capacity	Application	Organization Capacity/Key Personnel	Concerns that limiting Table C2 to leadership positions will disadvantage smaller CDFIs.	The CDFI Fund will consider additional guidance based on this comment.
195	4/23/2024	Community Development Bankers Association	Jeannine Jacokes	Capitalization Strategy	Application	Management Experience	Maintain current space limitations/character lengths. Do not reduce character limits or combine question responses.	The CDFI Fund made revisions based on public comments.
196	4/23/2024	Community Development Bankers Association	Jeannine Jacokes	Capitalization Strategy	Application	Investor Letters	Clarify when a prior allocatee is required to provide investor letters.	The CDFI Fund made revisions based on public comments.
197	4/23/2024	Community Development Bankers Association	Jeannine Jacokes	Exhibits	Application	Business Type	Add "childcare" as business type in Table A5.	The CDFI Fund will consider additional guidance based on this comment.
198	4/23/2024	Community Development Bankers Association	Jeannine Jacokes	Capitalization Strategy	Application	Management Experience	Allow Question 35 narrative to describe track record raising capital to offset character count lost by consolidating Exhibit E.	The CDFI Fund will consider changes in future application rounds.
199	4/23/2024	Community Development Bankers Association	Jeannine Jacokes	Community Outcomes	Review Process	Bonus Points	Give bonus points for CDFIs.	The CDFI Fund does not have statutory authority to implement this recommendation.
200	4/23/2024	Community Development Bankers Association	Jeannine Jacokes	Glossary of Terms	Application	Disadvantage Business	Revisit updates to definition.	The CDFI Fund made revisions based on public comments.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
201	4/23/2024	Community Development Bankers Association	Jeannine Jacokes	Post Award	Debriefing	Debriefing	Give more robust feedback in debriefing.	The CDFI Fund will consider ways to provide more detailed information in the debriefing document for unsuccessful applicants.
202	4/23/2024	Community Development Bankers Association	Jeannine Jacokes	Glossary of Terms	Application	Disadvantage Business	Increase maximum revenue level to \$500k.	The CDFI Fund made revisions based on public comments.
203	4/23/2024	Community Development Bankers Association	Jeannine Jacokes	Glossary of Terms	Application	Disadvantage Business	Delay implementation of definition change and allow transition period.	The CDFI Fund made revisions based on public comments.
204	4/23/2024	Native American Bank	Joel Smith	Community Outcomes	Application	Targeted Population	Include Indian Reservation in definition of "targeted population".	Targeted Populations are defined in IRS Regulations, not by the CDFI Fund Application materials.
205	4/23/2024	Native American Bank	Joel Smith	Community Outcomes	Application	Federal Native Areas	Support wording change to "Federal Native Areas."	Comment in support of proposed or existing text. No action necessary.
206	4/23/2024	Native American Bank	Joel Smith	Community Outcomes	Application	Community Accountability & Involvement	Adopt holistic definition of data in Question 27(b).	The CDFI Fund will consider additional guidance based on this comment.

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207	4/23/2024	Native American Bank	Joel Smith	General	Review Process	Set-Aside	Create a set aside for Native CDEs.	The CDFI Fund does not have statutory authority to implement this recommendation.
208	4/23/2024	Advantage Capital	Jonathan Goldstein	Business Strategy	Application	Due Diligence	Increase character limit for Question 18.	The CDFI Fund made revisions based on public comments.
209	4/23/2024	Advantage Capital	Jonathan Goldstein	Business Strategy	Review Process	Innovative Investments	Assign scores to Question 19 as incentive for innovative activities.	The CDFI Fund is maintaining the current requirements.
210	4/23/2024	Advantage Capital	Jonathan Goldstein	Business Strategy	Application	Innovative Investments	Add "non-use of affiliate leverage" as a category of innovative activity.	The CDFI Fund will consider changes in future application rounds.
211	4/23/2024	Advantage Capital	Jonathan Goldstein	Business Strategy	Application	Financial Products	Increase character limit for Question 14.	The CDFI Fund will consider changes in future application rounds.
212	4/23/2024	Advantage Capital	Jonathan Goldstein	Business Strategy, Exhibits	Application	Track Record vs Pipeline	Focus on track record instead pipeline, alternatively evaluate track record for past awardees and pipeline projects for new allocatees.	The CDFI Fund is maintaining the current requirements.
213	4/23/2024	Advantage Capital	Jonathan Goldstein	Community Outcomes	Application	Commitment to Areas of Higher Distress	Revert changes to Question 25(b).	The CDFI Fund made revisions based on public comments.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
214	4/23/2024	Advantage Capital	Jonathan Goldstein	Exhibits	Application	Operating businesses	Add "business services" as business type.	The CDFI Fund made revisions based on public comments.
215	4/23/2024	Advantage Capital	Jonathan Goldstein	Glossary of Terms	Application	Disadvantage Business	Revert definition of "Disadvantage Business."	The CDFI Fund made revisions based on public comments.
216	4/22/2024	District Honor	Joseph Crugnale	General	Application	Environmental, Social and Governance indicators	Utilize Environmental, Social, and Governance indicators in investments.	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
217	4/23/2024	Southern Bancorp Bank	Kenya Davenport	Post Award	Debriefing	Debriefing	Give detailed comments in debriefing.	The CDFI Fund will consider ways to provide more detailed information in the debriefing document for unsuccessful applicants.
218	4/23/2024	Southern Bancorp Bank	Kenya Davenport	Post Award	Debriefing	Debriefing	Give detailed scoring in debriefing.	The CDFI Fund will consider ways to provide more detailed information in the debriefing document for unsuccessful applicants.

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219	4/23/2024	Southern Bancorp Bank	Kenya Davenport	Community Outcomes	Review Process	Bonus Points	Give bonus points for CDFIs.	The CDFI Fund does not have statutory authority to implement this recommendation.
220	4/23/2024	Illinois Facilities Fund - IFF	Kirby Burkholder	Post Award	Debriefing	Debriefing	Give detailed comments in debriefing.	The CDFI Fund will consider ways to provide more detailed information in the debriefing document for unsuccessful applicants.
221	4/23/2024	Illinois Facilities Fund - IFF	Kirby Burkholder	Post Award	Debriefing	Debriefing	Give detailed scoring in debriefing.	The CDFI Fund will consider ways to provide more detailed information in the debriefing document for unsuccessful applicants.
222	4/23/2024	Illinois Facilities Fund - IFF	Kirby Burkholder	Community Outcomes	Review Process	Bonus Points	Give bonus points for CDFIs.	The CDFI Fund does not have statutory authority to implement this recommendation.
223	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Business Strategy	Application	Due Diligence	Due diligence documentation requires applicants to maintain extensive records which may exceed the assumed preparation hours.	The CDFI Fund is maintaining the current requirements.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
224	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Business Strategy	Application	Total QEI Needs	Describing detailed investment strategy based on community input increase burden.	The CDFI Fund is maintaining the current requirements.
225	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Business Strategy	Application	Due Diligence	Support changes to Question 18.	Comment in support of proposed or existing text. No action necessary.
226	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Community Outcomes	Application	Community Accountability & Involvement	Describing the involvement of LIC representatives takes time.	The CDFI Fund is maintaining the current requirements.
227	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Management Capacity	Application	Organization Capacity/Key Personnel	Information required adds complexity that requires additional resources which increases costs.	The CDFI Fund is maintaining the current requirements.
228	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Business Strategy	Application	Financial Products	Articulate distinction between descriptions for multiple financial products. Provide examples.	The CDFI Fund will consider additional guidance based on this comment.
229	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Business Strategy	Application	Financial Products	Provide examples of financial product narratives or scoring rubric.	The CDFI Fund will consider additional guidance based on this comment.
230	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Business Strategy	Application	Financial Products	Support revision in Questions 14(a) & 14(b)	Comment in support of proposed or existing text. No action necessary.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
231	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Business Strategy	Application	Financial Products	Providing distinct narratives for each financial product and detailed description of product structuring increases burden and cost to prepare application.	The CDFI Fund will consider additional guidance based on this comment.
232	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Business Strategy	Application	Financial Products	Simplify requirements or provide tool to calculate blended interest rate.	The CDFI Fund will consider additional guidance based on this comment.
233	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Business Strategy	Application	Financial Products	Provide example or template for Question 14(b). Simplify requirements or provide calculation tools.	The CDFI Fund will consider additional guidance based on this comment.
234	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Business Strategy	Application	Financial Products	Describing circumstances of terms and rates increase burden.	The CDFI Fund will consider additional guidance based on this comment.
318	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Business Strategy	Application	Invest in Other CDEs	Provide example or template for Question 14(c).	The CDFI Fund will consider additional guidance based on this comment.
236	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Business Strategy	Application	Invest in Other CDEs	Provide example or template for Question 14(c).	The CDFI Fund will consider additional guidance based on this comment.
237	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Business Strategy	Application	Invest in Other CDEs	Revert changes to instructions for Question 14(c).	The CDFI Fund is maintaining the current requirements.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
238	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Community Outcomes	Application	Align Investment with Community Input	Explain criteria used to assess the quality and alignment of community input with investment strategies.	The CDFI Fund will consider additional guidance based on this comment.
239	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Business Strategy	Application	Total QEI Needs	Provide tool to calculate and align QEI needs with allocation request.	The CDFI Fund will consider changes in future application rounds.
240	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Business Strategy	Application	Align Investment with Community Input	Support changes to Question 17(c).	Comment in support of proposed or existing text. No action necessary.
241	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Community Outcomes	IT Enhancement	Commitment to Areas of Higher Distress	Provide mapping tool or database for qualified distressed areas.	The CDFI Fund will consider changes in future application rounds.
242	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Community Outcomes	Application	Commitment to Areas of Higher Distress	Provide guideline, scoring rubric and scoring metric for Question 25(b).	The CDFI Fund will consider additional guidance based on this comment.
243	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Community Outcomes	Application	Commitment to Areas of Higher Distress	Analyzing data on areas of distress will increase costs.	The CDFI Fund will consider additional guidance based on this comment.
244	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Community Outcomes	Application	Commitment to Areas of Higher Distress	Commitment to invest in specific distress areas increase admin burden and costs.	The CDFI Fund will consider additional guidance based on this comment.
245	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Community Outcomes	Application	Commitment to Areas of Higher Distress	Commitment to invest in specific distress areas increase admin burden and costs.	The CDFI Fund will consider additional guidance based on this comment.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
246	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Community Outcomes	Application	Community Accountability & Involvement	Request for questions to be reformatted or add a table.	The CDFI Fund will consider changes in future application rounds.
247	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Community Outcomes	Application	Community Engagement	Make sure engagement is flexible and reflects unique communities.	The CDFI Fund will consider additional guidance based on this comment.
248	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Management Capacity	Application	Key Personnel	Make sure to consider wide range of CDEs, not just those with experienced management structures.	The CDFI Fund is maintaining the current requirements.
249	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Management Capacity	IT Enhancement	management experience	Add dropdown menu or autofill option to incorporate prior year submissions.	The CDFI Fund will consider additional guidance based on this comment.
250	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Management Capacity	Application	management experience	Support collecting detailed descriptions of org structure, key personnel and experience providing QLICIs.	Comment in support of proposed or existing text. No action necessary.
251	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Management Capacity	Application	Organization capacity/Key Personnel	Need to possibly hire additional staff will increase operational cost.	The CDFI Fund will continue its efforts to reduce burden in future application rounds.
252	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Management Capacity	Application	Organization Capacity/Key Personnel	Provide clarification on expectations for key personnel.	The CDFI Fund will consider additional guidance based on this comment.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
253	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Capitalization Strategy	Application	Capitalization	Consider incorporating CDE overarching goals and impact into strategy/track record of raising capital.	The CDFI Fund will consider changes in future application rounds.
254	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Capitalization Strategy	Application	Raising Capital	Documenting track record of capital raising and investment partnership is challenging and could increase cost.	The CDFI Fund will continue its efforts to reduce burden in future application rounds.
255	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Capitalization Strategy	IT Enhancement	Capitalization	Add or integrate digital templates for these questions.	The CDFI Fund will consider changes in future application rounds.
256	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Capitalization Strategy	Application	Capitalization	Provide instructions and formats for Questions 35-37. Share preferred format for Commitment Letters and Letters of Intent.	The CDFI Fund will consider additional guidance based on this comment.
257	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Capitalization Strategy	Application	Capitalization	Do not focus exclusively on ability or track record of raising capital. Add consideration for CDFI/Minority-CDEs that demonstrate growth potential and community impact.	The CDFI Fund is maintaining the current requirements.
258	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Business Strategy	Application	Innovation in Financial Product	Provide space for CDEs to discuss any innovative features of their financial products.	The CDFI Fund will consider changes in future application rounds.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
259	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Community Outcomes	Application	Sustainability and Viability of Investments	Add a question that encourages CDEs to discuss their strategies for ensuring the sustainability and long-term viability of their investments (reinvestments, additional capital, lasting benefits).	The CDFI Fund will consider changes in future application rounds.
260	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Community Outcomes	Application	Anticipated Social and Economic Impact	Add a question focused on anticipated social and economic impact of the proposed investments.	The CDFI Fund will consider changes in future application rounds.
261	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	AMIS	IT Enhancement	Online Application Portal	Suggest various format updates, functionality improvements to the online application interface for Applicants.	The CDFI Fund will consider additional guidance based on this comment.
262	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Provide Feedback	PRA	Review Draft Application	Provide incentives for CDEs to actively provide feedback to draft application.	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
263	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Customer Service	Capacity Building	Provide Technical Assistance	Provide technical assistance grants for smaller CDEs.	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
264	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Provide Feedback	PRA	Review Draft Application	Add a process for CDEs to receive feedback on draft applications.	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
265	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Capitalization Strategy	Application	Raising Capital	Describing history and strategies to raise capital require additional expertise/burden.	The CDFI Fund will continue its efforts to reduce burden in future application rounds.
266	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	General	Application	Streamline Application	Streamline application to essential info will be more cost efficient for smaller or resource-constrained CDEs.	The CDFI Fund will continue its efforts to reduce burden in future application rounds.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
267	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Estimated Hours of Burden	PRA	CDFI Fund Burden Estimate (hours)	Current burden estimate may underrepresent true cost of burden.	The CDFI Fund will continue its efforts to reduce burden in future application rounds.
268	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Post Award	Debriefing	Debriefing	Give more robust feedback in debriefing.	The CDFI Fund will consider ways to provide more detailed information in the debriefing document for unsuccessful applicants.
269	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Customer Service	Capacity Building	Provide Technical Assistance	Provide technical assistance for revised application sections.	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
270	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Customer Service	Capacity Building	Conduct Research	Conduct research to review participation and successes of Minority CDEs and understand barriers to entry and success.	The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
271	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Customer Service	Capacity building	Develop Partnerships	Develop partnerships with organizations to provide capacity building assistance for Minority CDEs.	The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
272	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Management Capacity	Application	Organization Capacity/Key Personnel	Detailed information requested may increase burden for new Applicants or those with recent structural changes.	The CDFI Fund will continue its efforts to reduce burden in future application rounds.
273	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	General	Application Instructions	Cost to Apply	Provide guidance and clarification so CDEs can better estimate cost to apply.	The CDFI Fund will consider additional guidance based on this comment.
274	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Customer Service	Capacity Building	Provide Technical Assistance	Provide technical assistance to Minority CDEs.	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
275	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	Community Outcomes	Review Process	Bonus Points	Give bonus points for CDFIs.	The CDFI Fund does not have statutory authority to implement this recommendation.
276	4/23/2024	African American Alliance of CDFI CEOs	Lenwood Long	General	Review Process	Minority-led CDEs	Revise review process to evaluate experience and performance of Minority CDEs.	The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
277	4/23/2024	Mid-City Community CDE	Lois Fried	Community Outcomes	Application	Federal/State/Local Zones	Restore "federal/state/local zones" as an area of distress.	The CDFI Fund is maintaining the current requirements.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
278	4/23/2024	Mid-City Community CDE	Lois Fried	Community Outcomes	Application	Commitment to Areas of Higher Distress	Revert changes to Question 25(b).	The CDFI Fund made revisions based on public comments.
279	4/23/2024	Mid-City Community CDE	Lois Fried	Glossary of Terms	Application	Disadvantage Business	Revert definition of "Disadvantage Business" or provide clarification to include for-profit businesses that create benefits for LIC residents or LIPs, or postpone changes apply to transactions closed after 1/1/25.	The CDFI Fund made revisions based on public comments.
280	4/18/2024	Primary Care Development Corporation	Louise Cohen	Community Outcomes	Application	Commitment to Areas of Higher Distress	Concern about changes to Question 25(b).	The CDFI Fund made revisions based on public comments.
281	4/18/2024	Primary Care Development Corporation	Louise Cohen	Community Outcomes	Application	Medically Underserved Areas	Support adding Healthcare Professional Shortage Areas (HPSAs).	Comment in support of proposed or existing text. No action necessary.
282	4/22/2024	Low Income Investment Fund	Makenzi Sumners	Post Award	Debriefing	Debriefing	Give detailed scoring in debriefing.	The CDFI Fund will consider ways to provide more detailed information in the debriefing document for unsuccessful applicants.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
283	4/22/2024	Low Income Investment Fund	Makenzi Sumners	Community Outcomes	Review Process	Bonus Points	Give bonus points for CDFIs.	The CDFI Fund does not have statutory authority to implement this recommendation.
284	4/22/2024	Low Income Investment Fund	Makenzi Sumners	Post Award	Debriefing	Debriefing	Give detailed comments in debriefing.	The CDFI Fund will consider ways to provide more detailed information in the debriefing document for unsuccessful applicants.
285	4/23/2024	Invest Detroit	Marcia Ventura	Community Outcomes	Application	Commitment to Areas of Higher Distress	Revert changes to Question 25(b). Suggest moving question to Innovative Activity or Phase 2.	The CDFI Fund made revisions based on public comments.
286	4/23/2024	Invest Detroit	Marcia Ventura	General	Review Process	Scoring Process	Request changes to increase scoring variability.	The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
287	4/23/2024	Invest Detroit	Marcia Ventura	Post Award	Debriefing	Debriefing	Give more robust feedback in debriefing.	The CDFI Fund will consider ways to provide more detailed information in the debriefing document for unsuccessful applicants.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
288	4/23/2024	The Housing Fund	Marshall Crawford	Business Strategy	Application	Total QEI Needs	Describing detailed investment strategy based on community input increase burden.	The CDFI Fund is maintaining the current requirements.
289	4/23/2024	The Housing Fund	Marshall Crawford	Business Strategy	Application	Due Diligence	Due diligence documentation requires applicants to maintain extensive records which may exceed the assumed preparation hours.	The CDFI Fund is maintaining the current requirements.
290	4/23/2024	The Housing Fund	Marshall Crawford	Business Strategy	Application	Due Diligence	Support due diligence requirement.	Comment in support of proposed or existing text. No action necessary.
319	4/23/2024	The Housing Fund	Marshall Crawford	Business Strategy	Application	Due Diligence	Provide checklist for due diligence.	The CDFI Fund will consider additional guidance based on this comment.
292	4/23/2024	The Housing Fund	Marshall Crawford	Community Outcomes	Application	Community Accountability & Involvement	Describing the involvement of LIC representatives takes time.	The CDFI Fund is maintaining the current requirements.
293	4/23/2024	The Housing Fund	Marshall Crawford	Business Strategy	Application	Financial Products	Articulate distinction between descriptions for multiple financial products. Provide examples.	The CDFI Fund will consider additional guidance based on this comment.
294	4/23/2024	The Housing Fund	Marshall Crawford	Business Strategy	Application	Financial Products	Support requiring distinct narratives for financial products.	Comment in support of proposed or existing text. No action necessary.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
295	4/23/2024	The Housing Fund	Marshall Crawford	Business Strategy	Application	Financial Products	Providing distinct narratives for each financial product and detailed description of product structuring increases burden and cost to prepare application.	The CDFI Fund will consider additional guidance based on this comment.
296	4/23/2024	The Housing Fund	Marshall Crawford	Business Strategy	Application	Financial Products	Provide example or template for Question 14(b). Simplify requirements or provide calculation tools.	The CDFI Fund will consider additional guidance based on this comment.
297	4/23/2024	The Housing Fund	Marshall Crawford	Business Strategy	Application	Financial Products	Describing circumstances of terms and rates increase burden.	The CDFI Fund will consider additional guidance based on this comment.
298	4/23/2024	The Housing Fund	Marshall Crawford	Business Strategy	Application	Invest in Other CDEs	Revert changes to instructions for Question 14(c).	The CDFI Fund is maintaining the current requirements.
299	4/23/2024	The Housing Fund	Marshall Crawford	Business Strategy	Application	Invest in Other CDEs	Provide example or template for Question 14(c).	The CDFI Fund will consider additional guidance based on this comment.
300	4/23/2024	The Housing Fund	Marshall Crawford	Community Outcomes	Application	Align Investment with Community Input	Explain criteria used to assess the quality and alignment of community input with investment strategies.	The CDFI Fund will consider additional guidance based on this comment.
301	4/23/2024	The Housing Fund	Marshall Crawford	Business Strategy	Application	Total QEI Needs	Provide tool to calculate and align QEI needs with allocation request.	The CDFI Fund will consider changes in future application rounds.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
302	4/23/2024	The Housing Fund	Marshall Crawford	Business Strategy	Application	Align Investment with Community Input	Support changes to Question 17(c).	Comment in support of proposed or existing text. No action necessary.
303	4/23/2024	The Housing Fund	Marshall Crawford	Community Outcomes	IT Enhancement	Commitment to Areas of Higher Distress	Provide mapping tool or database for qualified distressed areas.	The CDFI Fund will consider changes in future application rounds.
304	4/23/2024	The Housing Fund	Marshall Crawford	Community Outcomes	Application	Commitment to Areas of Higher Distress	Provide guideline, scoring rubric and scoring metric for Question 25(b).	The CDFI Fund will consider additional guidance based on this comment.
305	4/23/2024	The Housing Fund	Marshall Crawford	Community Outcomes	Application	Commitment to Areas of Higher Distress	Analyzing data on areas of distress will increase costs.	The CDFI Fund will consider additional guidance based on this comment.
306	4/23/2024	The Housing Fund	Marshall Crawford	Community Outcomes	Application	Commitment to Areas of Higher Distress	Commitment to invest in specific distress areas increase admin burden and costs.	The CDFI Fund will consider additional guidance based on this comment.
307	4/23/2024	The Housing Fund	Marshall Crawford	Community Outcomes	Application	Commitment to Areas of Higher Distress	Make sure definition of distress indicators are clear.	The CDFI Fund will consider additional guidance based on this comment.
308	4/23/2024	The Housing Fund	Marshall Crawford	Community Outcomes	Application	Community Accountability & Involvement	Maintain flexibility to acknowledge differences in local governance, organization type, and approaches to engage feedback.	The CDFI Fund will consider additional guidance based on this comment.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
309	4/23/2024	The Housing Fund	Marshall Crawford	Community Outcomes	Application	Community Accountability & Involvement	Request for questions to be reformatted or add a table.	The CDFI Fund will consider changes in future application rounds.
310	4/23/2024	The Housing Fund	Marshall Crawford	Management Capacity	Application	Organization Capacity/Key Personnel	Ensure consideration is not limited to experienced CDEs.	The CDFI Fund is maintaining the current requirements.
311	4/23/2024	The Housing Fund	Marshall Crawford	Management Capacity	Application	management experience	Add dropdown menu or autofill option to incorporate prior year submissions.	The CDFI Fund will consider additional guidance based on this comment.
312	4/23/2024	The Housing Fund	Marshall Crawford	Management Capacity	Application	Organization capacity/Key Personnel	Information required adds complexity that requires additional resources which increases costs.	The CDFI Fund is maintaining the current requirements.
313	4/23/2024	The Housing Fund	Marshall Crawford	Management Capacity	Application	Organization Capacity/Key Personnel	Provide clarification on expectations for key personnel.	The CDFI Fund will consider additional guidance based on this comment.
314	4/23/2024	The Housing Fund	Marshall Crawford	Capitalization Strategy	Application	Capitalization	Ensure expectations for leveraging non-equity investments are grounded in current and potential capabilities.	The CDFI Fund will consider changes in future application rounds.
315	4/23/2024	The Housing Fund	Marshall Crawford	Capitalization Strategy	Application	Raising Capital	Documenting track record of capital raising and investment partnership is challenging and could increase cost.	The CDFI Fund will continue its efforts to reduce burden in future application rounds.
316	4/23/2024	The Housing Fund	Marshall Crawford	Capitalization Strategy	Application	Capitalization	Add or integrate digital templates for these questions.	The CDFI Fund will consider changes in future application rounds.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
317	4/23/2024	The Housing Fund	Marshall Crawford	Capitalization Strategy	Application	Capitalization	Provide instructions and formats for Questions 35-37. Share preferred format for Commitment Letters and Letters of Intent.	The CDFI Fund will consider additional guidance based on this comment.
320	4/23/2024	The Housing Fund	Marshall Crawford	Business Strategy	Application	innovation in financial product	Provide space for CDEs to discuss any innovative features of their financial products.	The CDFI Fund will consider changes in future application rounds.
321	4/23/2024	The Housing Fund	Marshall Crawford	Community Outcomes	Application	Sustainability and Viability of Investments	Add a question that encourages CDEs to discuss their strategies for ensuring the sustainability and long-term viability of their investments (reinvestments, additional capital, lasting benefits).	The CDFI Fund will consider changes in future application rounds.
322	4/23/2024	The Housing Fund	Marshall Crawford	AMIS	IT Enhancement	Online Application Portal	Suggest various format updates, functionality improvements to the online application interface for Applicants.	The CDFI Fund will consider additional guidance based on this comment.
149	4/23/2024	The Housing Fund	Marshall Crawford	Provide Feedback	PRA	Review Draft Application	Provide incentives for CDEs to actively provide feedback to draft application.	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
235	4/23/2024	The Housing Fund	Marshall Crawford	Provide Feedback	PRA	Review Draft Application	Add a process for CDEs to receive feedback on draft applications.	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
323	4/23/2024	The Housing Fund	Marshall Crawford	Capitalization Strategy	Application	Raising Capital	Describing history and strategies to raise capital require additional expertise/burden.	The CDFI Fund will continue its efforts to reduce burden in future application rounds.
324	4/23/2024	The Housing Fund	Marshall Crawford	Customer Service	Capacity Building	Conduct Research	Conduct research to review participation and successes of Minority CDEs and understand barriers to entry and success.	The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
325	4/23/2024	The Housing Fund	Marshall Crawford	Community Outcomes	Application	Impact of investments on LIPs/LICs	Substantiating impact for LICs/LIPs requires additional analyst, which might increase burden.	The CDFI Fund is maintaining the current requirements.
326	4/23/2024	The Housing Fund	Marshall Crawford	Estimated Hours of Burden	PRA	CDFI Fund Burden Estimate (hours)	Current burden estimate may underrepresent true cost of burden.	The CDFI Fund will continue its efforts to reduce burden in future application rounds.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
327	4/23/2024	The Housing Fund	Marshall Crawford	Customer Service	Capacity Building	Provide Technical Assistance	Provide technical assistance for revised application sections.	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
328	4/23/2024	The Housing Fund	Marshall Crawford	Customer Service	Capacity building	Develop Partnerships	Develop partnerships with organizations to provide capacity building assistance for Minority CDEs.	The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
329	4/23/2024	The Housing Fund	Marshall Crawford	Management Capacity	Application	Management Experience	Revisions could increase burden and cost, especially for new CDEs or those with recent changes.	The CDFI Fund will continue its efforts to reduce burden in future application rounds.
330	4/23/2024	The Housing Fund	Marshall Crawford	General	Application Instructions	Cost to Apply	Provide guidance and clarification so CDEs can better estimate cost to apply.	The CDFI Fund will consider additional guidance based on this comment.
331	4/23/2024	The Housing Fund	Marshall Crawford	Business Strategy	Application	Social & economic Impact	Add a question focused on anticipated social and economic impact of the proposed investments.	The CDFI Fund is maintaining the current requirements.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
332	4/23/2024	The Housing Fund	Marshall Crawford	Customer Service	Capacity building	Provide Technical Assistance	Provide technical assistance to Minority CDEs.	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
333	4/23/2024	The Housing Fund	Marshall Crawford	Community Outcomes	Review Process	Bonus Points	Give bonus points for CDFIs.	The CDFI Fund does not have statutory authority to implement this recommendation.
334	4/23/2024	The Housing Fund	Marshall Crawford	General	Review Process	Minority-led CDEs	Revise review process to evaluate experience and performance of Minority CDEs.	The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
335	4/23/2024	The Housing Fund	Marshall Crawford	Post Award	Debriefing	Debriefing	Give detailed comments in debriefing.	The CDFI Fund will consider ways to provide more detailed information in the debriefing document for unsuccessful applicants.
336	4/16/2024	Opportunity Finance Network	Mary Scott Balys	Community Outcomes	Review Process	Bonus Points	Give bonus points for CDFIs.	The CDFI Fund does not have statutory authority to implement this recommendation.

Appendix A. CY 2024-26 NMTC Program Application PRA - Summary of Public Comments and CDFI Fund Responses

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
337	4/16/2024	Opportunity Finance Network	Mary Scott Balys	Glossary of Terms	Application	Disadvantage Business	Have concerns about \$100K revenue limit. Propose revisions to glossary term.	The CDFI Fund made revisions based on public comments.
338	4/16/2024	Opportunity Finance Network	Mary Scott Balys	Post Award	Debriefing	Debriefing	Give detailed comments in debriefing.	The CDFI Fund will consider ways to provide more detailed information in the debriefing document for unsuccessful applicants.
339	4/23/2024	Local Initiatives Support Corporation	Matthew Josephs	Business Strategy	Application	Innovative Investments	Recommend that the determination of what qualifies as an underserved state be reconsidered.	The CDFI Fund will consider changes in future application rounds.
340	4/23/2024	Local Initiatives Support Corporation	Matthew Josephs	Community Outcomes	Application	Community Outcomes	Request a comprehensive list of metrics for each community outcome and the elimination of the menu approach to selecting community outcomes.	The CDFI Fund will consider additional guidance based on this comment.
341	4/23/2024	Local Initiatives Support Corporation	Matthew Josephs	Community Outcomes	Application	Commitment to Areas of Higher Distress	Suggest moving question to Innovative Activity.	The CDFI Fund is maintaining the current requirements.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
342	4/23/2024	Local Initiatives Support Corporation	Matthew Josephs	Management Capacity	Application	Board/Key Personnel/Staffing	Management capacity narratives are time consuming and should not be necessary for prior Allocatees. Consider only requiring the Tables C1 & C2.	The CDFI Fund is maintaining the current requirements.
343	4/23/2024	Local Initiatives Support Corporation	Matthew Josephs	Management Capacity	Application	Organization Capacity/Key Personnel	Only require narratives for past allocatees that have experienced changes in its key personnel or had issues with prior allocation.	The CDFI Fund is maintaining the current requirements.
344	4/23/2024	Local Initiatives Support Corporation	Matthew Josephs	Capitalization Strategy	Application	Track Record of Raising Capital	Streamline questions for Applicants that have a track record of raising and deploying capital.	The CDFI Fund will consider changes in future application rounds.
345	4/23/2024	Local Initiatives Support Corporation	Matthew Josephs	Capitalization Strategy	Application	Investor Letters	Do away with requiring investor letters or letters of intent.	The CDFI Fund is maintaining the current requirements.
346	4/23/2024	Local Initiatives Support Corporation	Matthew Josephs	Management Capacity	Application	Fee Structure	Concerned that the question and table do not capture all fees, which might favor CDEs who are banks.	The CDFI Fund will consider additional guidance based on this comment.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
347	4/23/2024	Local Initiatives Support Corporation	Matthew Josephs	Management Capacity	Application	Fee Structure	Consider (1) moving Question 34 and Table D3 to Business Strategy so that they are scored; (2) factor into scoring whether the Applicant is relying on third-party entities to support the bulk of their NMTC deployment activities; and (3) reduce burden for prior allocatees by reviewing fee data already collected in the TLR.	The CDFI Fund will consider changes in future application rounds.
348	4/23/2024	Local Initiatives Support Corporation	Matthew Josephs	NOAA	NOAA	CDE Certification	Concerns/suggestions regarding requiring CDEs be certified by the NOAA publication date.	The CDFI Fund is maintaining the current requirements.
349	4/23/2024	Local Initiatives Support Corporation	Matthew Josephs	General	Review Process	Scoring Process	Various ideas for increasing scoring variability.	The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
350	4/23/2024	Local Initiatives Support Corporation	Matthew Josephs	NOAA	NOAA	QEI Issuance Requirements	Reduce QEI issuance threshold requirement for non-rural CDEs from 20% to 0%.	The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
351	4/23/2024	Local Initiatives Support Corporation	Matthew Josephs	Post Award	Review Process	Increased Transparency	Clarify what causes successful Applicants to receive reductions in their award amount.	The CDFI Fund will consider ways to provide more detailed information in the debriefing document for unsuccessful applicants.
352	4/23/2024	Local Initiatives Support Corporation	Matthew Josephs	Post Award	Debriefing	Debriefing	Give more robust feedback in debriefing.	The CDFI Fund will consider ways to provide more detailed information in the debriefing document for unsuccessful applicants.
353	4/23/2024	Local Initiatives Support Corporation	Matthew Josephs	Previous Awards	Application	Information on Previous Awards	Part V should be scored.	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
354	4/23/2024	Community Reinvestment Fund	Matthew Roth	Community Outcomes	Application	Commitment to Areas of Higher Distress	Propose moving area of deeper distress to Question 19.	The CDFI Fund made revisions based on public comments.
355	4/23/2024	Community Reinvestment Fund	Matthew Roth	Community Outcomes	Application	Quality Jobs	Propose standardizing definition of "Quality Jobs."	The CDFI Fund will consider additional guidance based on this comment.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
356	4/23/2024	Community Reinvestment Fund	Matthew Roth	Post Award	Debriefing	Debriefing	Give detailed comments in debriefing.	The CDFI Fund will consider ways to provide more detailed information in the debriefing document for unsuccessful applicants.
357	4/23/2024	Community Reinvestment Fund	Matthew Roth	General	Review Process	Phase 1 Review Instructions	Share instructions given to Phase 1 reviewers.	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
358	4/23/2024	Community Reinvestment Fund	Matthew Roth	Post Award	Debriefing	Debriefing	Give detailed scoring in debriefing.	The CDFI Fund will consider ways to provide more detailed information in the debriefing document for unsuccessful applicants.
359	4/23/2024	Community Reinvestment Fund	Matthew Roth	Community Outcomes	Review Process	Bonus Points	Give bonus points for CDFIs.	The CDFI Fund does not have statutory authority to implement this recommendation.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
360	4/23/2024	Community Reinvestment Fund	Matthew Roth	Glossary of Terms	Application	Disadvantage Business	Suggest alternate revision for "Disadvantage Business", and to postpone implementation until CY 2026 round.	The CDFI Fund made revisions based on public comments.
361	4/17/2024	Peoples Bank	Michael Tolleson	Post Award	Debriefing	Debriefing	Give detailed scoring in debriefing.	The CDFI Fund will consider ways to provide more detailed information in the debriefing document for unsuccessful applicants.
362	4/17/2024	Peoples Bank	Michael Tolleson	Community Outcomes	Review Process	Bonus Points	Give bonus points for CDFIs.	The CDFI Fund does not have statutory authority to implement this recommendation.
363	4/17/2024	Peoples Bank	Michael Tolleson	Post Award	Debriefing	Debriefing	Give detailed comments in debriefing.	The CDFI Fund will consider ways to provide more detailed information in the debriefing document for unsuccessful applicants.
364	4/23/2024	River Gorge Capital	Monica Blanton	Community Outcomes	Application	Federal/State/Local Zones	Restore "federal/state/local zones" as an area of distress.	The CDFI Fund is maintaining the current requirements.
365	4/23/2024	River Gorge Capital	Monica Blanton	Community Outcomes	Application	Commitment to Areas of Higher Distress	Revert changes to Question 25(b).	The CDFI Fund made revisions based on public comments.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
366	4/23/2024	River Gorge Capital	Monica Blanton	Glossary of Terms	Application	Disadvantage Business	Revert definition of "Disadvantage Business" or add nonprofit businesses servicing LIC residents and LIPs.	The CDFI Fund made revisions based on public comments.
367	4/16/2024	COPAL (Comunidades Organizand o el Poder y la Accion Latina)	Moriah O'Malley	Community Outcomes	Application	Commitment to Areas of Higher Distress	Revert changes to Question 25(b).	The CDFI Fund made revisions based on public comments.
368	4/23/2024	NMTC Coalition - Rapoza Associates	Paul Anderson	Business Strategy	Application	Additional Flexibility for Debt	Correct typo in Question 15(a).	The CDFI Fund made revisions based on public comments.
369	4/23/2024	NMTC Coalition - Rapoza Associates	Paul Anderson	Business Strategy	Application	Innovative Investments	Support adding 'Investing in Unrelated Minority-owned or Native American-owned or controlled CDEs.'	Comment in support of proposed or existing text. No action necessary.
370	4/23/2024	NMTC Coalition - Rapoza Associates	Paul Anderson	Community Outcomes	Application	Community Goods and Services	Add "childcare" as example in Question 26.	The CDFI Fund will consider changes in future application rounds.
371	4/23/2024	NMTC Coalition - Rapoza Associates	Paul Anderson	Community Outcomes	Application	Community Accountabilit y & Involvement	Delete new bullet asking about use of data or suggest alternate wording because it disadvantages rural CDEs or CDEs that serve rural areas.	The CDFI Fund will consider additional guidance based on this comment.
372	4/23/2024	NMTC Coalition - Rapoza Associates	Paul Anderson	Community Outcomes	Application	LILA/Healthy Foods	Support changes from "Food Desert" to "Low Income Low Access."	Comment in support of proposed or existing text. No action necessary.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
373	4/23/2024	NMTC Coalition - Rapoza Associates	Paul Anderson	Community Outcomes	Application	Medically Underserved Areas	Support adding Healthcare Professional Shortage Areas (HPSAs).	Comment in support of proposed or existing text. No action necessary.
374	4/23/2024	NMTC Coalition - Rapoza Associates	Paul Anderson	Community Outcomes	Application	Persistent Poverty Counties	Add "Persistent Poverty Census Tracts" to Question 25(b).	The CDFI Fund is maintaining the current requirements.
375	4/23/2024	NMTC Coalition - Rapoza Associates	Paul Anderson	Community Outcomes	Application	Commitment to Areas of Higher Distress	Revert changes to Question 25(b). Suggest moving question to Innovative Activity.	The CDFI Fund made revisions based on public comments.
376	4/23/2024	NMTC Coalition - Rapoza Associates	Paul Anderson	Community Outcomes	Application	Commitment to Areas of Higher Distress	Revisit definition; very narrow and limiting	The CDFI Fund made revisions based on public comments.
377	4/23/2024	NMTC Coalition - Rapoza Associates	Paul Anderson	Community Outcomes	Application	Commitment to Areas of Higher Distress	Consider capping the percentage of commitment that will impact scoring.	The CDFI Fund made revisions based on public comments.
378	4/23/2024	NMTC Coalition - Rapoza Associates	Paul Anderson	Community Outcomes	Application	Community Goods and Services	Remove third-party metrics requirement for community goods and services.	The CDFI Fund is maintaining the current requirements.
379	4/23/2024	NMTC Coalition - Rapoza Associates	Paul Anderson	Exhibits	Application	Business Type	Add "childcare" as business type in Table A5.	The CDFI Fund will consider additional guidance based on this comment.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
380	4/23/2024	NMTC Coalition - Rapoza Associates	Paul Anderson	Combined Rounds	NOAA	Combining Rounds	Support combining CY 2024 & CY 2025 rounds.	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
381	4/23/2024	NMTC Coalition - Rapoza Associates	Paul Anderson	Management Capacity	Application	Fee Structure	Support requirement to disclose fees.	Comment in support of proposed or existing text. No action necessary.
382	4/23/2024	NMTC Coalition - Rapoza Associates	Paul Anderson	Glossary of Terms	Application	Disadvantage Business	Revisit definition of "Disadvantage Business."	The CDFI Fund made revisions based on public comments.
383	4/23/2024	NMTC Coalition - Rapoza Associates	Paul Anderson	General	Review Process	Phase 1 Review Instructions	Share instructions given to Phase 1 reviewers.	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
384	4/23/2024	NMTC Coalition - Rapoza Associates	Paul Anderson	Management Capacity	Application	Board/Key Personnel/Staffing	Support the reduction in character particularly for prior allocatees. Only required narrative from prior allocatees' when they've experienced an issue.	The CDFI Fund will continue its efforts to reduce burden in future application rounds.
385	4/23/2024	NMTC Coalition - Rapoza Associates	Paul Anderson	General	Review Process	Scoring Process	Various ideas for increasing scoring variability.	The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
386	4/23/2024	NMTC Coalition - Rapoza Associates	Paul Anderson	Capitalization Strategy	Application	Investor Letters	Clarify when a prior allocatee is required to provide investor letters.	The CDFI Fund made revisions based on public comments.
387	4/23/2024	NMTC Coalition - Rapoza Associates	Paul Anderson	NOAA	NOAA	QEI Issuance Requirements	Reduce QEI issuance threshold requirement for non-rural CDEs from 20% to 0%.	The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
388	4/3/2024	Native CDFI Network, NAFOA Native American Finance Officers Association	Pete Upton; Susan Maston	Glossary of Terms	FAQ	Targeted Population	Confirm that American Indians, Alaska Natives, and Native Hawaiians are included in "targeted population" definition.	Targeted Populations are defined in IRS Regulations, not by the CDFI Fund Application materials.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
389	4/3/2024	Native CDFI Network, NAFOA Native American Finance Officers Association	Pete Upton; Susan Maston	Customer Service	Capacity Building	Develop training for federal and private investors	Work with Native CDEs and national Native Organizations to design a training explaining complications of developing and financing projects on tribal lands.	The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
390	4/3/2024	Native CDFI Network, NAFOA Native American Finance Officers Association	Pete Upton; Susan Maston	Customer Service	Capacity Building	Compatibility of Other Federal Funding	Work with other federal agencies to streamline guidelines and approval process using NMTC with other federal funding and loan guarantee programs.	The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
391	4/3/2024	Native CDFI Network, NAFOA Native American Finance Officers Association	Pete Upton; Susan Maston	Community Outcomes	Application	General	Add qualitative outcomes to quantitative community outcomes.	The CDFI Fund is maintaining the current requirements.
392	4/3/2024	Native CDFI Network, NAFOA Native American Finance Officers Association	Pete Upton; Susan Maston	Business Strategy	Application	Track Record of Investments	Consider other ways of evaluating track record aside from dollars.	The CDFI Fund is maintaining the current requirements.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
393	4/3/2024	Native CDFI Network, NAFOA Native American Finance Officers Association	Pete Upton; Susan Maston	Customer Service	Capacity Building	Provide Technical Assistance	Provide technical assistance grants for Native CDEs.	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
394	4/3/2024	Native CDFI Network, NAFOA Native American Finance Officers Association	Pete Upton; Susan Maston	General	Regulations	Set-Aside	Create a set aside for Native CDEs or give substantial priority points to Native CDEs.	The CDFI Fund does not have statutory authority to implement this recommendation.
395	3/15/2024	Travois New Markets	Phil Glynn	Community Outcomes	Application	Federal Native Areas	Support wording change to "Federal Native Areas."	Comment in support of proposed or existing text. No action necessary.
396	3/15/2024	Travois New Markets	Phil Glynn	Community Outcomes	Application	Community Accountability & Involvement	Adopt holistic definition of data in Question 27(b).	The CDFI Fund will consider additional guidance based on this comment.
397	4/19/2024	Travois New Markets	Phil Glynn	Community Outcomes	Application	Federal Native Areas	Support wording change to "Federal Native Areas."	Comment in support of proposed or existing text. No action necessary.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
398	4/19/2024	Travois New Markets	Phil Glynn	Community Outcomes	Application	Community Accountability & Involvement	Include tribal data in CDFI Fund's definition of "data." Make it clear that such data are sufficient response in FAQ.	The CDFI Fund will consider additional guidance based on this comment.
399	4/23/2024	River City Capital	Ron Brooks	Community Outcomes	Application	Total QEI Needs	Describing detailed investment strategy based on community input increase burden.	The CDFI Fund is maintaining the current requirements.
400	4/23/2024	River City Capital	Ron Brooks	Business Strategy	Application	Due Diligence	Due diligence documentation requires applicants to maintain extensive records which may exceed the assumed preparation hours.	The CDFI Fund is maintaining the current requirements.
401	4/23/2024	River City Capital	Ron Brooks	Business Strategy	Application	Due Diligence	Provide checklist for due diligence.	The CDFI Fund will consider additional guidance based on this comment.
402	4/23/2024	River City Capital	Ron Brooks	Community Outcomes	Application	LIC representatives	Describing the involvement of LIC representatives takes time.	The CDFI Fund is maintaining the current requirements.
403	4/23/2024	River City Capital	Ron Brooks	Community Outcomes	Application	Community Accountability & Involvement	Maintain flexibility to acknowledge differences in local governance, organization type, and approaches to engage feedback.	The CDFI Fund will consider additional guidance based on this comment.
404	4/23/2024	River City Capital	Ron Brooks	Business Strategy	Application	Financial Products	Articulate distinction between descriptions for multiple financial products. Provide examples.	The CDFI Fund will consider additional guidance based on this comment.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
405	4/23/2024	River City Capital	Ron Brooks	Business Strategy	Application	Financial Products	Support revision in Questions 14(a) & 14(b)	Comment in support of proposed or existing text. No action necessary.
406	4/23/2024	River City Capital	Ron Brooks	Business Strategy	Application	Financial Products	Provide example or template for Question 14(b). Simplify requirements or provide calculation tools.	The CDFI Fund will consider additional guidance based on this comment.
407	4/23/2024	River City Capital	Ron Brooks	Business Strategy	Application	Financial Products	Describing circumstances of terms and rates increase burden.	The CDFI Fund will consider additional guidance based on this comment.
408	4/23/2024	River City Capital	Ron Brooks	Business Strategy	Application	Invest in Other CDEs	Revert changes to instructions for Question 14(c).	The CDFI Fund is maintaining the current requirements.
409	4/23/2024	River City Capital	Ron Brooks	Business Strategy	Application	Invest in Other CDEs	Provide example or template for Question 14(c).	The CDFI Fund will consider additional guidance based on this comment.
410	4/23/2024	River City Capital	Ron Brooks	Community Outcomes	Application	Align Investment with Community Input	Explain criteria used to assess the quality and alignment of community input with investment strategies.	The CDFI Fund will consider additional guidance based on this comment.
411	4/23/2024	River City Capital	Ron Brooks	Business Strategy	Application	Total QEI Needs	Provide tool to calculate and align QEI needs with allocation request.	The CDFI Fund will consider changes in future application rounds.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
412	4/23/2024	River City Capital	Ron Brooks	Business Strategy	Application	Align Investment with Community Input	Support changes to Question 17(c).	Comment in support of proposed or existing text. No action necessary.
413	4/23/2024	River City Capital	Ron Brooks	Community Outcomes	IT Enhancement	Commitment to Areas of Higher Distress	Provide mapping tool or database for qualified distressed areas.	The CDFI Fund will consider changes in future application rounds.
414	4/23/2024	River City Capital	Ron Brooks	Community Outcomes	Application	Commitment to Areas of Higher Distress	Provide guideline, scoring rubric and scoring metric for Question 25(b).	The CDFI Fund will consider additional guidance based on this comment.
415	4/23/2024	River City Capital	Ron Brooks	Community Outcomes	Application	Commitment to Areas of Higher Distress	Commitment to invest in specific distress areas increase admin burden and costs.	The CDFI Fund will consider additional guidance based on this comment.
416	4/23/2024	River City Capital	Ron Brooks	Community Outcomes	Application	Commitment to Areas of Higher Distress	Make sure definition of distress indicators are clear.	The CDFI Fund will consider additional guidance based on this comment.
417	4/23/2024	River City Capital	Ron Brooks	Community Outcomes	Application	Community Accountability & Involvement	Request for questions to be reformatted or add a table.	The CDFI Fund will consider changes in future application rounds.
418	4/23/2024	River City Capital	Ron Brooks	Management Capacity	Application	Organization Capacity/Key Personnel	Ensure consideration is not limited to experienced CDEs.	The CDFI Fund is maintaining the current requirements.
419	4/23/2024	River City Capital	Ron Brooks	Management Capacity	Application	management experience	Add dropdown menu or autofill option to incorporate prior year submissions.	The CDFI Fund will consider additional guidance based on this comment.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
420	4/23/2024	River City Capital	Ron Brooks	Management Capacity	Application	Organization Capacity/Key Personnel	Provide clarification on expectations for key personnel.	The CDFI Fund will consider additional guidance based on this comment.
421	4/23/2024	River City Capital	Ron Brooks	Capitalization Strategy	Application	Raising Capital	Consider incorporating CDE overarching goals and impact into strategy/track record of raising capital.	The CDFI Fund will consider changes in future application rounds.
422	4/23/2024	River City Capital	Ron Brooks	Capitalization Strategy	Application	Raising Capital	Documenting track record of capital raising, and investment partnership is challenging and could increase cost.	The CDFI Fund will continue its efforts to reduce burden in future application rounds.
423	4/23/2024	River City Capital	Ron Brooks	Capitalization Strategy	Application	Capitalization	Add or integrate digital templates for these questions.	The CDFI Fund will consider changes in future application rounds.
424	4/23/2024	River City Capital	Ron Brooks	Capitalization Strategy	Application	Capitalization	Provide instructions and formats for Questions 35-37. Share preferred format for Commitment Letters and Letters of Intent.	The CDFI Fund will consider additional guidance based on this comment.
425	4/23/2024	River City Capital	Ron Brooks	Capitalization Strategy	Application	Raising Capital	Do not focus exclusively on ability or track record of raising capital. Add consideration for CDFI/CDEs and Minority CDEs that demonstrate growth potential and community impact.	The CDFI Fund is maintaining the current requirements.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
426	4/23/2024	River City Capital	Ron Brooks	Business Strategy	Application	Innovation in Financial Product	Provide space for CDEs to discuss any innovative features of their financial products.	The CDFI Fund will consider changes in future application rounds.
427	4/23/2024	River City Capital	Ron Brooks	Community Outcomes	Application	Sustainability and Viability of Investments	Add a question that encourages CDEs to discuss their strategies for ensuring the sustainability and long-term viability of their investments (reinvestments, additional capital, lasting benefits).	The CDFI Fund will consider changes in future application rounds.
428	4/23/2024	River City Capital	Ron Brooks	Community Outcomes	Application	Anticipated Social and Economic Impact	Add a question focused on anticipated social and economic impact of the proposed investments.	The CDFI Fund will consider changes in future application rounds.
429	4/23/2024	River City Capital	Ron Brooks	AMIS	IT Enhancement	Online Application Portal	Suggest various format updates, functionality improvements to the online application interface for Applicants.	The CDFI Fund will consider additional guidance based on this comment.
430	4/23/2024	River City Capital	Ron Brooks	Provide Feedback	PRA	Review Draft Application	Provide incentives for CDEs to actively provide feedback to draft application.	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
431	4/23/2024	River City Capital	Ron Brooks	Customer Service	Capacity Building	Provide Technical Assistance	Provide technical assistance grants for smaller CDEs.	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
432	4/23/2024	River City Capital	Ron Brooks	Provide Feedback	PRA	Review Draft Application	Add a process for CDEs to receive feedback on draft applications.	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
433	4/23/2024	River City Capital	Ron Brooks	Capitalization Strategy	Application	Raising Capital	Describing history and strategies to raise capital require additional expertise/burden.	The CDFI Fund will continue its efforts to reduce burden in future application rounds.
434	4/23/2024	River City Capital	Ron Brooks	Customer Service	Capacity Building	Conduct Research	Conduct research to review participation and successes of Minority CDEs and understand barriers to entry and success.	The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
435	4/23/2024	River City Capital	Ron Brooks	Community Outcomes	Application	Impact of investments on LIPs/LICs	Substantiating impact for LICs/LIPs requires additional analyst, which might increase burden.	The CDFI Fund is maintaining the current requirements.
436	4/23/2024	River City Capital	Ron Brooks	Management Capacity	Application	management experience	Provide clarification on compliance measures expected from Applicants.	This comment is related to Allocatee reporting/compliance and will be considered in the future.
437	4/23/2024	River City Capital	Ron Brooks	General	Application	Streamline Application	Streamline application to essential info will be more cost efficient for smaller or resource-constrained CDEs.	The CDFI Fund will continue its efforts to reduce burden in future application rounds.
438	4/23/2024	River City Capital	Ron Brooks	Customer Service	Capacity Building	Provide Technical Assistance	Provide technical assistance for revised application sections.	This comment is not related to burden in completing the NMTC Program Application. The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
439	4/23/2024	River City Capital	Ron Brooks	Customer Service	Capacity Building	Develop Partnerships	Develop partnerships with organizations to provide capacity building assistance for Minority CDEs.	The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
440	4/23/2024	River City Capital	Ron Brooks	Management Capacity	Application	Management Experience	Revisions could increase burden and cost, especially for new CDEs or those with recent changes.	The CDFI Fund will continue its efforts to reduce burden in future application rounds.
441	4/23/2024	River City Capital	Ron Brooks	General	Application Instructions	Cost to Apply	Provide guidance and clarification so CDEs can better estimate cost to apply.	The CDFI Fund will consider additional guidance based on this comment.
442	4/23/2024	River City Capital	Ron Brooks	Estimated Hours of Burden	PRA	CDFI Fund Burden Estimate (hours)	Consider that changes will increase burden especially for smaller CDEs.	The CDFI Fund will continue its efforts to reduce burden in future application rounds.
443	4/23/2024	River City Capital	Ron Brooks	General	Regulations	Set-Aside	Create a set aside for Minority CDEs.	The CDFI Fund does not have statutory authority to implement this recommendation.
444	4/23/2024	River City Capital	Ron Brooks	Post Award	Debriefing	Debriefing	Give more robust feedback in debriefing.	The CDFI Fund will consider ways to provide more detailed information in the debriefing document for unsuccessful applicants.

Appendix A. CY 2024-26 NMTC Program Application PRA - Summary of Public Comments and CDFI Fund Responses

#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
445	4/23/2024	River City Capital	Ron Brooks	Post Award	Debriefing	Debriefing	Give more robust feedback in debriefing.	The CDFI Fund will consider ways to provide more detailed information in the debriefing document for unsuccessful applicants.
446	4/23/2024	River City Capital	Ron Brooks	Community Outcomes	Review Process	Bonus Points	Give bonus points for CDFIs.	The CDFI Fund does not have statutory authority to implement this recommendation.
447	4/23/2024	River City Capital	Ron Brooks	General	Review Process	Minority-led CDEs	Revise review process to evaluate experience and performance of Minority CDEs.	The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.
448	4/23/2024	AltCap	Ruben Alonso	Post Award	Debriefing	Debriefing	Give detailed scoring in debriefing.	The CDFI Fund will consider ways to provide more detailed information in the debriefing document for unsuccessful applicants.
449	4/23/2024	AltCap	Ruben Alonso	Community Outcomes	Review Process	Bonus Points	Give bonus points for CDFIs.	The CDFI Fund does not have statutory authority to implement this recommendation.

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450	4/23/2024	AltCap	Ruben Alonso	Post Award	Debriefing	Debriefing	Give detailed comments in debriefing.	The CDFI Fund will consider ways to provide more detailed information in the debriefing document for unsuccessful applicants.
451	4/23/2024	PIDC Community Capital	Sam Rhoads	Community Outcomes	Application	Federal/State/Local Zones	Restore "federal/state/local zones" as an area of distress.	The CDFI Fund is maintaining the current requirements.
452	4/23/2024	PIDC Community Capital	Sam Rhoads	Community Outcomes	Application	Commitment to Areas of Higher Distress	Revert changes to Question 25(b).	The CDFI Fund made revisions based on public comments.
453	4/23/2024	PIDC Community Capital	Sam Rhoads	Glossary of Terms	Application	Disadvantage Business	Revert definition of "Disadvantage Business" or postpone changing definition to after 1/1/2025.	The CDFI Fund made revisions based on public comments.
454	4/23/2024	Advanced CapAccess	Stephanie Koenen	Community Outcomes	Application	Commitment to Areas of Higher Distress	Revert changes to Question 25(b).	The CDFI Fund made revisions based on public comments.
455	4/23/2024	Advanced CapAccess	Stephanie Koenen	Glossary of Terms	Application	Disadvantage Business	Revert definition of "Disadvantage Business."	The CDFI Fund made revisions based on public comments.
456	4/23/2024	Black Hawk Economic Development	Stephen Brustkern	Glossary of Terms	Application	Disadvantage Business	Revert change to "Disadvantage Business."	The CDFI Fund made revisions based on public comments.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
457	4/23/2024	Native American Finance Officers Association - NAFOA	Susan Masten	Community Outcomes	Other	Federal Native Areas	Support wording change to "Federal Native Areas."	Comment in support of proposed or existing text. No action necessary.
458	4/23/2024	Native American Finance Officers Association - NAFOA	Susan Masten	Community Outcomes	Other	Community Accountability & Involvement	Qualify "data" with respect to Tribal data sovereignty	The CDFI Fund will consider additional guidance based on this comment.
459	4/22/2024	AMCREF Community Capital	Susan Seagren	Community Outcomes	Application	Federal/State/Local Zones	Restore "federal/state/local zones" as an area of distress.	The CDFI Fund is maintaining the current requirements.
460	4/22/2024	AMCREF Community Capital	Susan Seagren	Community Outcomes	Application	Disadvantage Business	Add "Persistent Poverty Counties" in Question 25(a) or 25(b).	The CDFI Fund is maintaining the current requirements.
461	4/22/2024	AMCREF Community Capital	Susan Seagren	Community Outcomes	Application	Commitment to Areas of Higher Distress	Revert changes to Question 25(b). Suggest moving question to Innovative Activity or Phase 2.	The CDFI Fund made revisions based on public comments.
462	4/22/2024	AMCREF Community Capital	Susan Seagren	NOAA	NOAA	QEI Issuance Requirements	Reduce QEI issuance threshold requirement for non-rural CDEs from 20% to 0%.	The CDFI Fund will continue to evaluate the issues raised in making future policy decisions.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
463	4/23/2024	Beneficial State Bank	Terra Neilson	Post Award	Debriefing	Debriefing	Give detailed comments in debriefing.	The CDFI Fund will consider ways to provide more detailed information in the debriefing document for unsuccessful applicants.
464	4/23/2024	Beneficial State Bank	Terra Neilson	Post Award	Debriefing	Debriefing	Give detailed scoring in debriefing.	The CDFI Fund will consider ways to provide more detailed information in the debriefing document for unsuccessful applicants.
465	4/23/2024	Beneficial State Bank	Terra Neilson	Community Outcomes	Review Process	Bonus Points	Give bonus points for CDFIs.	The CDFI Fund does not have statutory authority to implement this recommendation.
466	5/2/2024	Native American Bank	Thomas Ogaard	Post Award	Debriefing	Debriefing	Give detailed scoring in debriefing.	The CDFI Fund will consider ways to provide more detailed information in the debriefing document for unsuccessful applicants.
467	5/2/2024	Native American Bank	Thomas Ogaard	Community Outcomes	Review Process	Bonus Points	Give bonus points for CDFIs.	The CDFI Fund does not have statutory authority to implement this recommendation.

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#	Date of Comment	Organization	Author Name	Section	Category	Topic	Comment	NMTC Response
468	5/2/2024	Native American Bank	Thomas Ogaard	Post Award	Debriefing	Debriefing	Give detailed comments in debriefing.	The CDFI Fund will consider ways to provide more detailed information in the debriefing document for unsuccessful applicants.