

**Department of the Treasury**  
**Justification for Non-Material Change**  
**Emergency Capital Investment Program**  
**OMB: 1505-0275**

The Consolidated Appropriations Act, 2021, signed into law on December 27, 2020, added Section 104A of the Community Development Banking and Financial Institutions Act of 1994 (the "Act"). Section 104A authorizes the Secretary of the Treasury to establish the Emergency Capital Investment Program (ECIP), to support the efforts of low- and moderate-income community financial institutions to, among other things, provide loans, grants, and forbearance for small businesses, minority-owned businesses, and consumers, especially in low-income and underserved communities, including persistent poverty counties, that may be disproportionately impacted by the economic effects of the COVID-19 pandemic.

The Department of Treasury is submitting a request for a non-material change to OMB Control Number 1505-0275 to update the reporting form and instructions of the Voluntary Impact Highlight Report (VIHR). There is no change to the information being requested (i.e., on a voluntary basis, participants are encouraged to report high-impact loans, financial services, and initiatives undertaken after ECIP investment. Reports are completed electronically through the ECIP Salesforce Account); the change only provides participants an additional format upon which they are permitted to make the allocation of consent, and financial or demographic categories. To accomplish the change, Treasury has updated the reporting form and instructions as outlined below:

- **Voluntary Impact Highlight Report (VIHR) form:**
  1. Instructions associated with the Consent to share field (shown on the attached exemplar). Allows the participant to choose a category of consent for information and narratives submitted through the form.
  2. Instructions associated with the Participant offers field (shown on the attached exemplar). Allows the participant to choose to report a new loan product or financial service.
  3. Instructions associated with Participant leverages field (shown on attached exemplar). Allows the participant to choose to report investment transaction types.
  4. Instructions associated with the loan or investment to field (shown on the attached exemplar). Allows the participant to choose various demographic categories.
  5. Instructions associated with request to add a new VIHR (shown on the attached exemplar). Allows participant to add a new VIHR from the existing form.

These changes to the forms are not estimated to have any impact on the currently approved burden.