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Category	Comment
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Ease of Use	Streamline forms and templates: Use standardized forms and templates for all submissions to ensure consistency and reduce the time needed to fill them out. Provide clear, concise instructions for each section of the forms.
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Ease of Use	<p>Automate Data Collection: Implement an online portal where applicants can submit information electronically. Use automated data validation to reduce errors and minimize back-and-forth communications.</p> <p>Consolidate Reporting Requirements: Combine similar reporting requirements to eliminate redundancy. Align reporting timelines with other funding sources to reduce the frequency of submissions.</p>
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Ease of Use	
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Ease of Use	Simplify Financial Reporting: Focus on key financial metrics rather than requiring detailed line-by-line budgets. Allow for summary financial reports with the option to provide detailed reports if necessary
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Ease of Use	Use Pre-populated Information: For returning applicants, pre-populate forms with previously submitted information that only need to be updated, rather than re-entered from scratch.
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Ease of Use

Implement Tiered Reporting: Adjust the level of detail required based on the size and scope of the project. Smaller projects could have simpler reporting requirements, while larger projects might provide more detailed information.

Ease of Use

Use Data Sharing Agreements: When possible, establish agreements with other funders or government agencies to share data, reducing the need for duplicate submissions.

Ease of Use

Outcome-focused Reporting: Focus on collecting data that directly measures the impact and outcomes of the projects rather than process-oriented metrics. Prioritize data that is most critical for assessing program effectiveness and compliance.

Burden

The CDFI Fund should continuously review and update its estimates of the burden of information collection to ensure they accurately reflect current economic conditions and organizational capacities. This ongoing assessment will help ensure that the information collection process remains efficient and manageable for all participants, regardless of economic fluctuations. Implementing efficiencies in the information collection process, such as standardized reporting formats, and automated data validation, can help reduce the burden. It's important to assess whether these improvements are keeping pace with technological and economic changes.

Ease of Use

Streamline Reporting Requirements, Tiered Reporting: Implement a tiered reporting system where smaller projects have simplified reporting requirements compared to larger, more complex projects. Allow for summary reports with the option to provide detailed reports only when necessary.

Ease of Use

Streamline Reporting Requirements, Reduce Redundancy: Review data collection requirements to eliminate redundant or unnecessary questions. Consolidate similar information into single sections to avoid repetition

Ease of Use Focus on Outcome-Oriented Data, Relevance and Impact: Prioritize the collection of data that directly measures the impact and outcomes of the funded projects. Focus on key performance indicators (KPIs) that align with the program's goals, such as the number of affordable housing units created or preserved and the economic impact on low-income communities.

Ease of Use Focus on Outcome-Oriented Data, Simplify Metrics: Use straightforward, easily measurable metrics to capture essential information. Provide clear definitions and guidelines for each metric to ensure consistency in reporting.

Burden Simplified Reporting Requirements: Tiered Reporting: Design tiered reporting systems that reduce the complexity of information required from CDFIs and low-income community projects

Burden Simplified Reporting Requirements: Essential Data Focus: Focus on collecting only essential information that directly impacts program assessment, eliminating unnecessary questions.

1. Standardize and Simplify Forms:

Simplify Language: Use clear, concise language and eliminate unnecessary jargon.

Predefined Templates: Utilize standardized templates that reduce the need for custom entries.

Pre-Filled Information: Where possible, pre-fill forms with known data to minimize manual entry.

Automated Data Validation: Implement automated validation to check for errors and completeness in real-time.

Automate Data Collection

Integration with Existing Systems: Integrate with existing financial and operational systems to pull data automatically.

Data Import Features: Enable bulk data import features to reduce manual data entry.

Simplify Reporting Requirements

Tiered Reporting System: Implement a tiered system that requires less detailed reporting from smaller entities.

Essential Information Only: Focus on collecting only the most essential information to reduce the reporting burden.

Leverage Existing Data

Data Sharing Agreements: Establish agreements with other organizations to share relevant data, reducing the need for duplicate reporting.

Public Records Utilization: Use available public records to pre-fill or validate data provided by respondents.

Continuous Improvement: Use the feedback to make continuous improvements to the forms, processes, and support systems.

Streamline Data Requests

Reduce Redundancy: Eliminate redundant data requests by consolidating similar information into single data points.

Logical Flow: Design forms and portals with a logical flow that guides respondents through the process efficiently

Costs

The CDFI Fund should move away from Annual Performance Reports entirely and instead refocus its information collection and impact measurement efforts towards verifying project completion in compliance with all agreement requirements

Ease of Use

Burden The data required to complete the data collection is to burdensome, and the CDFI Fund's estimate for completing the data collection is too low.

Duplicative The CDFI Fund should move away from Annual Performance Reports entirely and instead refocus its information collection and impact measurement efforts towards verifying project completion in compliance with all agreement requirements.

Burden Provided support of CDFI Fund's "Presumptively Compliant" projects and hopes that the presumption results in a reduced reporting requirement

Burden Supportive of the CDFI Fund's efforts to ensure that the program creates the intended impact of leveraging private investment in affordable housing and economic development in underserved communities through the deployment of federal dollars. But those efforts could be streamlined to reduce the overall reporting burden on awardees and allow the awardees to focus their efforts on creating more affordable housing and economic development investment in the communities that need it most.

Burden Estimates of costs required to provide compliance information are too low.

Ease of Use The CMF Coalition strongly believes that the CDFI Fund should review its Performance Report requirements to generally encourage more flexibility, innovation and usage.

Burden Provided support of CDFI Fund's "Presumptively Compliant" projects and hopes that the presumption results in a reduced reporting requirement.

General Make CMF Performance Report data publicly available an annual basis.

General Requests that the CDFI Fund release a report to the public which provides annual application summary statistics.

Ease of Use “Affordability Period Program Income” and “Eligible Units Financed with Program Income During Affordability Period” – The CMF Coalition is concerned that these new data reporting fields appear to imply that Recipients will be required to track Program Income, and units financed with Program Income, following completion of the Recipient’s Investment Period. This may create a new long-term reporting requirement that is not currently required under existing regulations for Program Income.

Ease of Use “Tracking Occupants of Units by Income Category” – Currently, CMF Recipients track the number of homes/units by income category, not individual occupants in those dwellings, which would be a new and challenging requirement. We request additional information pertaining to this new data field.

Ease of Use “Loan Term (in months)” – CMF Coalition members have posed questions concerning the proposed new category that would require reporting the number of months from loan origination until maturity. Currently, Recipients are required to track the term of the loan, and we are unsure why the loan origination would be included in the timeline calculation.

Burden Recommends that the CDFI Fund ensure that every change made to the AMIS portal is adequately and appropriately tested before reporting from Recipients is required, and suggested the creation of a technical working group who can collectively beta test program improvements prior to implementation.

Costs Recommends that the CDFI Fund create a separate application process for smaller organizations, with less burdensome reporting requirements.

General

Recommends that the CDFI Fund prioritize communication with applicants, grant writers, industry coalitions and governmental entities, such as Members of Congress and Congressional Committees to ensure that the program is effectively administered, while promoting the consistent successes of the most flexible and effective affordable housing program in the federal government.

OCME Office Response

The CDFI Fund believes these recommendations are addressed through the completion of standard online forms in AMIS.

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The CDFI Fund believes these recommendations are addressed through the completion of standard online forms in AMIS. The reporting deadline for this form is due 3 months after the end of the period of performance to align with the requirements in the Uniform Requirements. Further, the revised interim rule allows for alignment with certain provisions of other federal programs through "Presumptive Compliance."

The CDFI Fund believes these recommendations will be addressed through the online completion of this form. Information being collected is necessary to determine award compliance, and as required per the Uniform Requirements.

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The CDFI Fund is unable to fully accommodate this request. Information being collected is necessary to determine award compliance.

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The CDFI Fund is unable to fully accommodate this request. Information being collected is necessary to determine award compliance.

The CDFI Fund believes these recommendations are being addressed through the Paperwork Reduction Act process, and will be addressed through the online completion of this form.

The CDFI Fund is unable to fully accommodate this request. Information being collected is necessary to determine award compliance.

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The CDFI Fund believes these recommendations will be addressed through the online completion of this form. The CDFI Fund has reviewed the data fields in the data collection and made recommendations for numerous data fields to be removed, which will decrease the recipient reporting burden. In addition, the data points being required in this data collection are needed to determine award compliance.

The CDFI Fund is unable to fully accommodate this request. Information being collected is necessary to determine award compliance, and as required per the Uniform Requirements.

The CDFI Fund believes these recommendations are addressed through the completion of standard online forms in AMIS. Further, the revised interim rule allows for alignment with certain provisions of other federal programs through "Presumptive Compliance".

The CDFI Fund believes these recommendations will be addressed through the online completion of this form. The data points being required in this data collection are needed to determine award compliance.

The CDFI Fund believes the time estimates are accurate based on the completion of standard online forms in AMIS. Information being collected is necessary to determine award compliance. The CDFI Fund notes that the revised interim rule allows for alignment with certain provisions of other federal programs through "Presumptive Compliance".

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The CDFI Fund publishes the Agency Financial Report, as well as the Annual Report, providing detailed information to the public.

The CDFI Fund publishes the Agency Financial Report, as well as the Annual Report, providing detailed information to the public. The CDFI Fund also publishes an Annual Award Book on each CMF round which includes key Applicant highlights.

The CDFI Fund agrees that this data point should be clarified. These recommendations will be addressed through supplemental guidance. Information being collected is necessary to determine award compliance, and as required per the Uniform Requirements.

The CDFI Fund is not switching to a policy of tracking individual occupants. The policy of tracking the number of homes/units by income category remains unchanged.

The CDFI Fund appreciates the comment and will clarify the data point. The text will be clarified to align with the intent as "Loan Term - from closing to maturity (months)".

The CDFI Fund will ensure proper testing is completed prior to deployment of the CMF Performance Report. The CDFI Fund appreciates the recommendation to create a technical working group, however, we are not able to accommodate this request at this time.

Not applicable to CMF Performance Data Collection. We are not able to accommodate this request at this time.

This comment is not related to the burden of the CMF Performance Data Collection or Environmental Review form. The CDFI Fund will take this feedback under advisement where appropriate.
