Department of the Treasury
Information Collection Request – Supporting Statement

Emergency Capital Investment Program Reports
OMB No. 1505-0275

A. Justification

1. <u>Circumstances necessitating the collection of information</u>

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" or "Program") 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 have been disproportionately impacted by the economic effects of the COVID-19 pandemic by providing direct and indirect capital investments in low-and moderate-income community financial institutions.

As required by the Act, the interest and dividend rates payable on ECIP instruments are determined based on the increase in the amount of lending by an institution within minority, rural, and urban low-income and underserved communities and to low- and moderate-income borrowers during the preceding annual period compared to a baseline set from the annual period ending on September 30, 2020. To establish this baseline level of qualified lending, Treasury collected an Initial Supplemental Report (ISR) from participating applicants. This baseline must be adjusted to reflect mergers and acquisitions, should those events occur. The Quarterly Supplemental Report (QSR) allows for the collection of data on the increase in qualified and deep impact lending from the baseline amount established through the ISR. Legal certifications support validation of the accuracy of information reported to Treasury

Treasury requests approval of the following forms associated with collection of compliance, legal certifications, and performance information from financial institutions that are participating in the program and to consolidate such forms under a single collection number.

(1) Routine collection of the Initial Supplemental Report for use in the event of certain mergers and acquisitions or other circumstances, inclusive of separate versions for credit unions and bank and holding companies.
(2) Quarterly Supplemental Report, inclusive of separate versions for credit unions and banks and holding companies.
(3) Legal certifications required by legal agreements.

2. Use of the data

The information reported will allow Treasury to (1) adjust the baseline amount of qualified lending as a result of mergers and acquisitions; (2) review details on the composition of qualified lending for each applicant for purposes of determining qualification for rate reductions for payments due to Treasury and program evaluation; and (3) facilitate compliance with legal agreements, as well as for complying with any reporting, recordkeeping, and transparency requirements under the Act.

3. Use of information technology

Treasury will collect data through a Salesforce-based system that requires upload of .xlsx files, .csv files, upload of attachments, or direct data entry into the platform.

4. Efforts to identify duplication

The information is collected under statutory mandates or result from legal agreements implementing the statute. None of the information is known to overlap with any other data collected under any other information collections at Treasury.

The information being collected is not publicly available and can only be collected from the participants.

5. Impact on small entities

This collection of information will impact small financial institutions participating in the program similar to other institutions. Due to statutory and legal requirements, all institutions are subject to the same reporting requirements.

6. Consequences of less frequent collection and obstacles to burden reduction

Treasury will collect the information only to the extent necessary to administer the statutory, regulatory, and legal requirements of the program. Treasury cannot meet its statutory requirement to implement the program without this information.

7. Circumstances requiring special information collection

There are no special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

8. Solicitation of comments on information collection and justification for expedited processing pursuant to 5 C.F.R. § 1320.13

Treasury announced in the Federal Register on March 20, 2026 (91 FR 13700) that it was soliciting comments for 60 days on the forms and instructions for (1) the Initial Supplemental Report, (2) the Quarterly Supplemental Report, and (3) legal certifications, under OMB Control Number 1505-0275. No comments were received in response to the Federal Register notice. Treasury made no edits to the forms and instructions.

9. Provision of payments to respondents

No payments or gifts are provided to respondents.

10. Assurance of confidentiality

Information collected will be kept confidential to the extent appropriate and consistent with the Freedom of Information Act and other applicable laws.

11. Justification of sensitive questions

No sensitive questions will be asked.

12. Estimate of the annual hour burden of information collection.

For the Emergency Capital Investment Program reporting components, the associated recordkeeping and compliance reporting burden estimates are as follows:

Information Collection	Number of Respondents	# Responses Per Respondent	Total Responses	Hours per response	Total Burden in Hours	Cost to Respondent*
Initial Supplemental Report – M&A version	10	1	10	160	1,600	$87,024
Quarterly Supplemental Report Schedules A & B**	165	4	660	10	6,660	$362,237
Quarterly Supplemental Report Schedules C & D**	165	1	165	120	19,800	$1,076,922
Legal Certifications	165	3	495	10 minutes each	83	$4,514
TOTAL			**1,330**		**28,143**	**$1,530,697**

* Bureau of Labor Statistics (BLS), U.S. Department of Labor, Occupational Outlook Handbook, Accountants and Auditors, on the Internet at https://www.bls.gov/ooh/business-and-financial/accountants-and-auditors.htm (visited February 19, 2026). In 2024, the median pay for accounts and auditors was $39.27/hour. To account for the fully-loaded employer cost of employee compensation, the median pay is increased by 38.5%, resulting in a fully-loaded wage rate of $54.39. According to BLS's Employer Cost for Employee Compensation from September 2025 (released on September 12, 2025: https://www.bls.gov/news.release/pdf/ecec.pdf), employers provided 38.5% of total employee compensation in the form of non-wage compensation (i.e., benefits such as paid leave, health insurance, etc.) for state and local government workers.
** Quarterly Supplemental Report Schedules A & B are completed four times a year. Schedules C & D and completed only once a year. For clarity these are shown separately in the table.

Treasury estimates each response requires two FTEs for two weeks on average to prepare the data and submit it.

13. Estimated total annual cost burden to respondents

The total estimated burden cost is $1,530,697 including time necessary to compile data, complete and submit the forms.

14. Estimated cost to the federal government.

Federal costs are estimated to be $280,000 annually. These costs are associated with confirming receipt of the reports. Limited follow-up may be required in the event of missing data points but do not require analysis beyond confirmation of completeness.

15. Reasons for change in burden

This collection of information reflects changes to remove some forms that are no longer being used, update the number of respondents in line with changes in program participation, and better reflect the reporting frequency and burden hours associated with completing each form based on Treasury's experience with the Program.

16. Plans for tabulation, statistical analysis, and publication

While not planned at this time, Treasury may publish qualified lending data on a summary basis to support transparency and reporting on program impact. Tabulations could include sub-tabulations by geography or institution type.

17. Display of the expiration date for OMB approval

Treasury plans to display the expiration date for OMB approval of the information collection on all instruments.

18. Exceptions to submission requirements

There are no exceptions to the submission requirements for the Initial Supplemental Report, Quarterly Supplemental Report, or legal certifications.

Part B. Describe the use of statistical methods such as sampling or imputation

This collection does not employ statistical methods.