DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

Supporting Statement
Bank Enterprise Award Program
OMB Control Number 1559-0005

A. Justification

1. Circumstances necessitating the collection of information

The Community Development Financial Institutions Fund (CDFI Fund) administers the Bank Enterprise Award Program (BEA Program). The BEA Program was authorized by the Bank Enterprise Award Act of 1991. The regulations governing the BEA Program can be found at 12 C.F.R. Part 1806 (the Interim Rule). The Interim Rule provides the evaluation criteria and other requirements of the BEA Program.

The BEA Program provides formula-based grants to depository institutions that are insured by the Federal Deposit Insurance Corporation (FDIC) for increasing their levels of loans, investments, Service Activities, and technical assistance to residents and businesses in the most economically Distressed Communities, and financial assistance and technical assistance to certified Community Development Financial Institutions (CDFIs) through equity investments, equity-like loans, grants, stock purchases, loans, deposits, and other forms of assistance, during a specified period.

The CDFI Fund collects data from prospective BEA Program Applicants once per funding round via an online BEA Program Application. The information collected will be used to select award recipients, based on a merit-based selection process. The requested information is required by the BEA Program Interim Rule (12 CFR Part 1806) and respective Notices of Funds Availability (NOFA).

2. Method of collection and use of data

The CDFI Fund will collect data once per funding round by means of the voluntary submission of an online Application. Applicants must complete and upload all Application materials through the Awards Management Information System (AMIS), a CDFI Fund-managed web-based application portal. The CDFI Fund uses the data collected to determine award recipients and applicable award amounts. The award selection process and award amount criteria are described in the respective NOFA.

3. Use of Information Technology

Only electronic applications are accepted. All Application materials must be submitted via the AMIS platform.

The CDFI Fund only accepts electronic applications, unless an applicant receives advance written permission from the CDFI Fund to submit in another format. All application materials must be submitted in the CDFI Fund-managed web-based application portal except for the SF-424, which must be submitted through Grants.gov.

4. Efforts to identify duplication

The BEA Program application does not request information that is publicly available from other Federal agencies. The BEA Program also makes every effort to avoid requesting duplicate data by pulling data from existing organizational profiles, such as addresses, Employer Identification Numbers (EIN), and CDFI certification information, whenever possible.

5. Impact on small entities

This collection of information will minimally affect small entities. The CDFI Fund will minimize the burden on small entities by asking for readily available information. The collection of information is used to verify transactions are eligible per the requirements as outlined in BEA Program Statute (USC Title 12. Chapter 16. Sections 1834a) and Interim Rule (12 CFR Part 1806).

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

The CDFI Fund cannot meet its statutory requirement to make funding decisions based on data received from applicants without the data within the application form and required attachments. The requirements of the BEA Program Statute (USC Title 12. Chapter 16. Sections 1834a) and Interim Rule (12 CFR Part 1806) limit the extent to which the burden can be reduced. The BEA Program receives annual appropriations.

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

Comments on the BEA Program application were solicited in the *Federal Register* on March 10, 2026 (91 FR 11594). The CDFI Fund received public comments from 3 organizations in response to this request, which are available in the public docket (CDFI-2026-0001). Comments generally fell into six categories: (a) whether the collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility; (b) the accuracy of the agency's estimate of the burden of the collection of information; (c) ways to enhance the quality, utility, and clarity of the information to be collected; (d) ways to minimize the burden of the collection of information on respondents, including through the use of technology; (e) estimates of capital or start-up costs and costs of operation, maintenance, and purchase of services required to provide information; and (f) general comments..

Please see Tables 1 and 2 for specific comments and BEA Program team responses.

9. Provision of payment 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 questions of a sensitive nature are asked in this information collection. No personally identifiable information (PII) is collected.

12. Estimate of the hour burden of information collection.

The estimated total number of burden hours for the Application is 10,440. This estimate is based on 174 Applicants, which is the average number of BEA Program applications received over the past three funding rounds and an estimated hour burden per application of 60 hours per applicant.

The CDFI Fund has made efforts to further minimize the collection burden following the 2023 BEA PRA review of the Application by updating the Application for the FY 2026 – 2029 funding rounds, clarifying guidance and instructions, improving the Application submission process, streamlining supporting documentation requirements, and by implementing technical updates. The CDFI Fund anticipates that these changes will reduce the average hours per response from 80 in the FY 2024 funding round to 60 in FY 2026.

Affected Public	**# Respondents**	**Hours per Response**	**Total Hours**	**Time Value (per hour)**	**Monetized Burden Hours**
Bank Enterprise Award Program	174	60	10,440	$86.76[1]	$905,774

[1] The hourly rate is based on the national estimate for the median hourly wage for Financial Managers according the Bureau of Labor Statistics (*https://www.bls.gov/oes/current/oes113031.htm*)

The CDFI Fund notes that hour burden per application can vary widely since it is driven primarily by the number of transactions an applicant chooses to submit. An applicant must submit at least one transaction and the CDFI Fund does not limit the number of transactions an applicant can submit.

13. Estimate of total annual cost burden to respondents

Per the table in Question 12, the total annual labor cost to respondents is $905,774. No purchase of equipment or services will need to be made by respondents for this information collection other than as required as a part of customary and usual business practices.

14. Estimate of annualized cost to the Government

The estimated annualized cost to the Government is the CDFI Fund staff and contractor time required to develop the application, review submitted applications, and report the results. The estimate is based on the expected number of hours and loaded labor rate for the CDFI Fund staff and cost of IT contractor services for the lifecycle of the collection. This estimate is based on the projected federal employee labor costs of $72.72. The federal employee labor costs reflect loaded rates by GS level and based on an estimated 3,000 labor hours. The estimated total cost is $718,160.

Expense Category	Cost
IT Contract	$ 500,000
CDFI Fund Staff	$218,160
Total	**$718,160**

15. Any program changes or adjustments

The BEA Program has not materially changed, and the proposed FY 2026-2029 BEA Program application is substantially similar to what was approved in 2023. The CDFI Fund has made efforts to further minimize the collection burden following the 2023 BEA PRA review of the Application by updating the Application for the FY 2026 – 2029 funding rounds, clarifying guidance and instructions, improving the Application submission process, streamlining supporting documentation requirements, and by implementing technical updates. There is an increase in burden due to adjustment in agency estimates, following growth in the average number of BEA Program applications received over the past three funding rounds (from 141 to 174 applications).

16. Plans for information tabulation and publication

Confidential or proprietary information collected through this information collection will not be published.

17. Reasons for not displaying expiration date of OMB approval

The CDFI Fund will display the expiration date of the OMB approval on the application form.

18. Explanation of exceptions to certification statement

There are no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods

This collection does not employ statistical methods.

Appendix 1: Bank Enterprise Program Application Respondents and Comment Summary

Table 1: Bank Enterprise Award Program Application Respondents

No.	Organization Name	Organization Representative	Date Submitted
1	Community Development Bankers Association (CDBA)	Jeannine Jacokes	May 7, 2026
2	National Bankers Association (NBA)	Nicole A. Elam, Esq.	May 8, 2026
3	Sones & White Consulting	Ben Sones and Everett White	May 11, 2026

Table 2: Bank Enterprise Award Program Comment Summary

Organization	Topic	Comment	Response
Community Development Bankers Association (CDBA)	Is the data proposed to be collected necessary and appropriate for award decisions?	Yes. The existing data fields effectively capture the increases in qualified activities, CDFI-related activities, distressed community lending and investment, and development service activities.	The CDFI Fund has taken this comment into consideration as confirmation that, generally, information collected in the BEA Program Application is appropriate.
National Bankers Association (NBA)	Is the data proposed to be collected necessary and appropriate for award decisions?	Yes, in substantial part. The core data elements — applicant eligibility information, baseline and assessment period transaction-level data, geographic coding to identify Distressed Communities, CDFI Partner identification, and supporting documentation for award calculation — are reasonably necessary to administer the formula-based award framework established under 12 CFR Part 1806. However, the NBA respectfully submits that several categories of information collected through the Application exceed what is necessary for award determination and duplicate data already in the CDFI Fund's possession or readily available from other federal sources.	The CDFI Fund has taken this comment into consideration and addresses specific recommendations in responses to other comments.
National Bankers Association (NBA)	Is the data proposed to be collected necessary and appropriate for award decisions?	Institution-level financial and identifying data (FDIC Certificate Number, charter type, asset size, holding company information) is already populated in the Awards Management Information System ("AMIS") and is independently reportable through the FDIC Call Report. Applicants should not be required to re-enter or re-attest to this information at the application stage; the	The CDFI Fund has taken this comment into consideration and will explore the viability of implementing the recommended

		Application should pre-populate from AMIS organization profile data with applicant verification. CDFI certification status for both the Applicant and CDFI Partners is maintained by the CDFI Fund itself. Requiring applicants to re-attest to or document this information adds burden without independent informational value.	enhancements in future BEA Program funding rounds. The CDFI Fund also notes many of the data points listed in this comment are already prepopulated in the BEA Program Application.
National Bankers Association (NBA)	Is the data proposed to be collected necessary and appropriate for award decisions?	Census tract-level eligibility determinations should be automated rather than performed manually by applicants. The Community Investment Mapping System ("CIMS") already contains the authoritative Distressed Community and Persistent Poverty County data; requiring applicants to manually run or reconcile these determinations introduces avoidable error and rework.	The BEA Program Application already allows organizations to submit transaction level data via bulk uploads via a CSV that returns Distressed Community determinations in an automated manner. Transactions are not required to be located within Persistent Poverty Counties to be an eligible BEA Program transaction. However, the CDFI Fund will explore the viability of making enhancements to the bulk upload process that would allow

			Applicants to verify a transaction’s location in a PPC.
Sones & White Consulting	Is the data proposed to be collected necessary and appropriate for award decisions?	Yes. We think the information collected by the CDFI Fund for the BEA Program is, in general, appropriate for the proper performance of the functions of the agency.	The CDFI Fund has taken this comment into consideration as confirmation that, generally, information collected in the BEA Program Application is appropriate.
Community Development Bankers Association (CDBA)	In general, does the data and information requested in the BEA Program Application allow an applicant to demonstrate its lending, investment and service activities in BEA Program Distressed Communities or to CDFIs?	Yes. The application provides CDFI banks with a strong framework to document both their CDFI-related and distressed community activities across the relevant periods.	The CDFI Fund has taken this comment into consideration as confirmation that generally, information requested in the BEA Program Application allows an Applicant to demonstrate its qualifying activities.
National Bankers Association (NBA)	In general, does the data and information requested in the BEA Program Application allow an applicant to	The Application's transaction-level reporting structure for Distressed Community Financing Activities and CDFI Related Activities works reasonably well for institutions with modern loan origination systems and structured data warehouses. It is significantly more burdensome for smaller MDIs that rely on core processors with limited reporting flexibility. For these institutions, generating the required	The CDFI Fund has taken this comment into consideration and addresses the commentor’s recommendation in responses to other

	demonstrate its lending, investment and service activities in BEA Program Distressed Communities or to CDFIs?	transaction-level files for both the Baseline Period and Assessment Period is the single largest driver of application burden. We address this further in our response to Question 5.	comments.
National Bankers Association (NBA)	In general, does the data and information requested in the BEA Program Application allow an applicant to demonstrate its lending, investment and service activities in BEA Program Distressed Communities or to CDFIs?	The Service Activities category, in our members' experience, undercaptures the full range of mission-aligned services that MDIs provide in Distressed Communities. Branch openings, ATM placements, and standard depository products are captured well, but high-impact activities such as financial coaching, second-chance banking products, language-accessible services, community partnerships, and culturally tailored small-dollar lending often do not map cleanly onto the existing Service Activity definitions. The Application would more accurately reflect MDI impact if Service Activity definitions were modernized, and we offer specific recommendations under Question 4.	The CDFI Fund has taken this comment into consideration and addresses the commentor’s recommendation in responses to other questions.
Sones & White Consulting	In general, does the data and information requested in the BEA Program Application allow an applicant to demonstrate its lending, investment and	Yes.	The CDFI Fund has taken this comment into consideration as confirmation that generally, information requested in the BEA Program Application allows an Applicant to demonstrate its qualifying activities.

	service activities in BEA Program Distressed Communities or to CDFIs?		
Community Development Bankers Association (CDBA)	Are certain data fields, questions or tables redundant or unnecessary?	No. CDBA does not recommend eliminating any current data fields.	The CDFI Fund has taken this comment into consideration as confirmation that generally, no data fields in the BEA Program Application are redundant or unnecessary.
National Bankers Association (NBA)	Are certain data fields, questions or tables redundant or unnecessary?	Duplicate institution-identifying fields. As noted, basic organizational information (FDIC Certificate Number, EIN, address, holding company structure) is collected both at the AMIS organization level and again at the application level. The CDFI Fund should consolidate this into AMIS and surface it as read-only within the Application.	The CDFI Fund has taken this comment into consideration and will explore technical enhancements to auto populate additional organizational information into the BEA Program Application in future rounds. The CDFI Fund also notes many of the data points listed in this comment are already prepopulated in the BEA Program Application.

National Bankers Association (NBA)	Are certain data fields, questions or tables redundant or unnecessary?	The Notice's burden estimate of 80 hours expressly includes optional questions. Where optional fields are not material to the formula-based award determination, they should be either removed or clearly de-emphasized so that applicants do not feel compelled to complete them out of an abundance of caution.	While the notice of information collection and request for public comment includes a reference to optional questions, the CDFI Fund notes that there are not any optional questions in the BEA Program Application.
National Bankers Association (NBA)	Are certain data fields, questions or tables redundant or unnecessary?	Repetitive narrative attestations. Several certifications and assurances are restated in multiple sections of the Application, sometimes with subtly different language. A single, consolidated attestation page would reduce burden and reduce the risk of inconsistent representations.	The CDFI Fund has determined currently existing attestations are necessary and will not eliminate any of the existing attestations.
National Bankers Association (NBA)	Are certain data fields, questions or tables redundant or unnecessary?	Title VI Compliance Worksheet duplication. Where the same applicant has already submitted a current-year Title VI Compliance Worksheet for another CDFI Fund program (CDFI Program, Capital Magnet Fund, NACA Program, Small Dollar Loan Program), the Worksheet should be carried forward in AMIS rather than re-submitted within the BEA Application.	The Title VI Compliance Worksheet has been removed from the BEA Program Application.
Sones & White Consulting	Are certain data fields, questions or tables redundant or unnecessary?	No.	The CDFI Fund has taken this comment into consideration as confirmation that generally, no data fields in the BEA

			Program Application are redundant or unnecessary.
Community Development Bankers Association (CDBA)	Should any data fields, questions or tables be added to ensure collection of relevant information?	No. CDBA does not recommend adding new data fields at this time.	The CDFI Fund has taken this comment into consideration and will not, at this time, add any new data fields to the BEA Program Application.
National Bankers Association (NBA)	Should any data fields, questions or tables be added to ensure collection of relevant information?	The Application should include a clearly identified field for FDIC designated MDI status, drawn from the FDIC's MDI list. Although MDI status is not a statutory eligibility factor for the BEA Program, capturing it would enable the CDFI Fund to track the program's impact on MDI lending and investment, support reporting under Section 308 of the Financial Institutions Reform, Recovery, and Enforcement Act ("FIRREA"), and inform Congressional oversight of the program.	The CDFI Fund has taken this comment into consideration and will not, at this time, add any new data fields to the BEA Program Application
National Bankers Association (NBA)	Should any data fields, questions or tables be added to ensure collection of relevant information?	To the extent permitted under applicable fair lending and privacy frameworks, the Application could capture aggregated, de-identified information regarding borrower demographics for Distressed Community Financing Activities, leveraging data already collected under the Home Mortgage Disclosure Act ("HMDA") and the CFPB's Section 1071 small business data collection. This would not require new origination practices, only the reporting of data already maintained.	The CDFI Fund will not collect additional data on Distressed Community Financing Activities (DCFA) transactions via the BEA Program Application. Existing data fields are sufficient to make accurate award decisions for applications that include DCFA

			transactions.
National Bankers Association (NBA)	Should any data fields, questions or tables be added to ensure collection of relevant information?	The Service Activities table should be expanded to recognize: (i) digital banking products tailored to LMI consumers; (ii) language accessible and culturally tailored financial products and services; (iii) bank-led financial coaching and counseling delivered directly or through community partners; and (iv) second chance and ChexSystems-friendly account programs. These activities are central to MDI business models and the CDFI Fund's community development mission.	The CDFI Fund has taken this comment into consideration and will not, at this time, make these changes. The BEA Program Application explicitly includes many forms of technical assistance and financial education within the existing definition of Community Services. The BEA Program Application also explicitly includes time, savings, and/or demand deposits within the existing definition of Deposit Liabilities. However, the CDFI Fund will take this comment into consideration to inform future policy and program design decisions.
National Bankers Association (NBA)	Should any data fields, questions or tables be added to ensure collection of	CDFI Related Activities should expressly recognize equity investments, equity-like loans, deposits, and grants made to FDIC-designated MDIs, even where the recipient MDI is not separately CDFI-certified. Many MDIs are not separately certified as CDFIs despite serving similar community	The CDFI Fund has taken this comment into consideration and will not, at this time, make these changes.

	relevant information?	development missions, and investments in MDIs advance the same community development objectives as investments in Certified CDFIs. Recognizing these investments — at a minimum on a parallel basis with CDFI Related Activities — would close a meaningful gap in the program's incentive structure and align the BEA Program with Section 308 of FIRREA, the Emergency Capital Investment Program, and other federal frameworks that explicitly value MDI capitalization.	The BEA Program cannot recognize investments to non-CDFI certified MDIs as CDFI Related Activities under existing statutory authority.
Sones & White Consulting	Should any data fields, questions or tables be added to ensure collection of relevant information?	No.	The CDFI Fund has taken this comment into consideration and will not, at this time, add any new data fields to the BEA Program Application.
Community Development Bankers Association (CDBA)	Are there any data fields, questions or tables that are particularly difficult or burdensome to answer?	No. CDBA members are committed to participants in the BEA Program and approach the application process as an investment in their communities.	The CDFI Fund has taken this comment into consideration as confirmation that, generally, no data fields in the BEA Program Application are particularly difficult or burdensome.
National Bankers Association (NBA)	Are there any data fields, questions or tables that are particularly difficult or burdensome to answer?	Yes. Based on consultation with our member institutions . . . [some] elements are disproportionately burdensome, particularly for smaller MDIs.	The CDFI Fund has taken this comment into consideration and addresses specific recommendations in responses to other comments.

National Bankers Association (NBA)	Are there any data fields, questions or tables that are particularly difficult or burdensome to answer?	Generating geocoded transaction files for each 12-month period is the single largest source of application burden. Smaller institutions often must extract data from multiple systems, manually reconcile loan-level records, and geocode addresses against the CDFI Fund's Distressed Communities data. The CDFI Fund should publish a standardized transaction level data schema, accept bulk uploads in a documented machine-readable format (CSV with a published data dictionary), and provide a CIMS-integrated geocoding utility that returns Distressed Community and Persistent Poverty County determinations directly. A standardized API or batch geocoding service would materially reduce burden and error rates.	The BEA Program Application already allows organizations to submit transaction level data in bulk uploads via a CSV that returns Distressed Community determinations directly. Transactions are not required to be located within Persistent Poverty Counties to be an eligible BEA Program transaction. However, the CDFI Fund will explore the viability of making enhancements to the bulk upload process that would allow Applicants to verify a transaction's location in a PPC.
National Bankers Association (NBA)	Are there any data fields, questions or tables that are particularly difficult or burdensome to answer?	For CDFI Related Activities, the supporting documentation requirements (executed loan documents, evidence of disbursement, evidence of CDFI certification, and matching to specific Distressed Community deployment) are, in aggregate, the most documentation-intensive part of the Application. Where the CDFI Partner is a Certified CDFI in good standing in AMIS, the CDFI Fund should accept a	Applicants are not required to submit supporting documentation for CDFI Related Activities transactions equal to or less than

		streamlined attestation in lieu of full documentation, reserving full documentation for risk based audit and compliance review.	$500,000. Applicants must maintain documentation on file for transactions equal to or less than $500,000 and make it available for review at the request of the CDFI Fund. For transactions above $500,000, the CDFI Fund will continue to require Applicants to submit supporting documentation.
National Bankers Association (NBA)	Are there any data fields, questions or tables that are particularly difficult or burdensome to answer?	Persistent Poverty County deployment commitment. The PPC deployment commitment is captured at the application stage but is more accurately understood as a forward-looking commitment. Smaller institutions report uncertainty about how to estimate the PPC percentage in advance of receiving an award. The CDFI Fund should clarify the standard, provide a worked example, and confirm the consequences, if any, of deploying at percentages different from the initial commitment.	The CDFI Fund will provide additional guidance clarifying Persistent Poverty County (PPC) Commitments in the BEA Program Application Frequently Asked Questions (FAQs) document.
National Bankers Association (NBA)	Are there any data fields, questions or tables that are particularly difficult or burdensome to	Several specific AMIS workflows — including session timeouts during data entry, limited bulk-edit functionality, and the inability to save-and-resume certain tables in progress — add substantial time to application preparation unrelated to the underlying reporting requirements. The CDFI Fund's burden estimate of 80 hours likely understates	The CDFI Fund will continue to make technical improvements to the Awards Management Information System

	answer?	the true burden for smaller institutions, in part, because it does not appear to fully account for these system-level frictions.	(AMIS) in an effort to reduce Applicant burden.
Sones & White Consulting	Are there any data fields, questions or tables that are particularly difficult or burdensome to answer?	No.	The CDFI Fund has taken this comment into consideration as confirmation that, generally, no data fields in the BEA Program Application are particularly difficult or burdensome.
National Bankers Association (NBA)	Comment on the Burden Estimate	The Notice estimates 80 hours per respondent and a total annual burden of 13,920 hours across 174 respondents. Based on consultation with NBA members that have applied to the BEA Program in recent funding rounds, we believe this estimate understates actual burden for smaller MDIs and CDFI banks, particularly first-time applicants. Member institutions more commonly report application preparation times ranging from 120 to 200 hours for institutions without dedicated grants-management staff, with most incremental hours attributable to transaction-level data preparation, geocoding, and AMIS workflow friction.	The CDFI Fund has reviewed Applicant-reported data, which supports the average estimated burden across all types of Applicants.
National Bankers Association (NBA)	Comment on the Burden Estimate	The NBA urges the CDFI Fund to address the declining real-dollar value of BEA awards resulting from persistent inflation. At the same time, administrative burdens on smaller MDIs continue to rise due to increasing labor, compliance, and technology costs, while award tiers have not kept pace. This creates a "compliance tax" that	This comment is not related to the Application questions and burden.

		disproportionately affects mission-driven institutions with limited overhead. As the cost of geocoding, data reconciliation, and application preparation increasingly approaches the value of smaller awards, the program risks reaching a tipping point where community-focused banks are effectively priced out of participating. To preserve the BEA Program's effectiveness as a catalyst for capital deployment in Distressed Communities, the CDFI Fund should index award tiers to inflation and implement a streamlined application track for smaller institutions.	
National Bankers Association (NBA)	Comment on the Burden Estimate	The NBA respectfully recommends that the CDFI Fund (i) revisit the 80-hour estimate to better reflect first-time applicant experience and the experience of institutions without dedicated grants infrastructure, (ii) report burden separately for applicants below a threshold asset size (for example, $1 billion), and (iii) commit to publishing measurable burden-reduction targets tied to specific Application and AMIS improvements.	The CDFI Fund has taken this comment into consideration and will not, at this time, make these changes. However, the CDFI Fund notes that several measures have been taken in the proposed BEA Program Application to streamline the Application process that should result in burden reduction. Additionally, the BEA Program Application already includes one burden reducing feature requested by the commentor, bulk upload of transactions that are automatically

			verified for eligibility.
Sones & White Consulting	Comment on the Burden Estimate	We believe the CDFI Fund estimate of 80 hours to collect the necessary information and prepare a BEA Application to be accurate.	The CDFI Fund has taken this comment into consideration.
Sones & White Consulting	Ways to Enhance Quality, Utility, and Clarity of Information Collected	Because the BEA Application in its current form produces a robust collection of data, we have no comment on ways to enhance the quality, utility, and clarity of the information collected.	The CDFI Fund has taken this comment into consideration and will not make any changes to information collection in the BEA Program Application.
Sones & White Consulting	Ways to Minimize Burden of Collection	We appreciate the ways that the CDFI Fund has already minimized the burden of collection and have no comment on further ways to reduce the burden at this time.	The CDFI Fund has taken this comment into consideration.
Sones & White Consulting	Cost Estimate	The primary cost for providing the information required to prepare a BEA Application is the wages, fees, and opportunity costs associated with the time that applicants' staff and independent contractors spend collecting and organizing the requested information. As reflected in the CDFI Fund's estimate, an average applicant's staff and/or independent contractors spend 80 hours collecting and organizing this information.	The CDFI Fund has taken this comment into consideration.
National Bankers Association (NBA)	General Comments	Pre-population from AMIS and federal sources. The CDFI Fund should adopt a default policy that any data already held by the CDFI Fund (in AMIS, in CIMS, or in CDFI Certification records) or available from another federal agency (FDIC Call Report data, FFIEC HMDA data, FFIEC CRA data) is pre-populated and presented to the applicant for verification rather than re-entered on an anonymized basis. This would convert a one-way reporting burden into a two-way exchange of value and would support MDI strategic planning.	The CDFI Fund has taken this comment into consideration and will explore technical enhancements to auto populate additional organizational information into the BEA Program Application in future

			rounds.
National Bankers Association (NBA)	General Comments	The CDFI Fund should consider a streamlined application track for institutions below a defined asset threshold or for institutions whose prior-year award would fall below a de minimis amount. A streamlined track would meaningfully expand participation by smaller MDIs, several of which have indicated they have foregone participation in the BEA Program in years where the projected award did not justify the application burden.	The CDFI Fund has taken this comment into consideration and will not implement a different application for institutions below a defined asset threshold or for institutions whose prior-year award would fall below a de-minimis amount. However, the CDFI Fund will take this comment to inform future policy and program design decisions.
National Bankers Association (NBA)	General Comments	The CDFI Fund should institutionalize an annual stakeholder workshop, with explicit MDI participation, focused on Application design and burden reduction. The NBA stands ready to convene member institutions to support such a workshop.	The CDFI Fund will take this comment into consideration to inform future policy and program design decisions.
National Bankers Association (NBA)	General Comments	To enhance the practical utility of the data collected, the CDFI Fund should return to each applicant — at no additional reporting burden — a benchmarking report comparing the applicant's qualified activity profile to peer institutions on an anonymized basis. This would convert a one-way reporting burden into a two-way exchange of value and would support MDI strategic planning.	The CDFI Fund will take this comment into consideration to inform future policy and program design decisions.
Community	General	CDBA is particularly pleased to see the proposed increase in	The CDFI Fund will

Development Bankers Association (CDBA)	Comments	the loan documentation threshold from $250,000 to $500,000. This is a meaningful and welcome change that will reduce administrative burden on applicants while preserving the integrity of the application process, and we strongly support it. To help applicants implement this change consistently and correctly, CDBA respectfully requests that the CDFI Fund provide clarifying guidance on documentation. Under the current guidance, loans up to $250,000 are treated as fully disbursed without the submission of supporting loan documents. We request confirmation that this same treatment, full disbursement presumption, will apply to loans up to $500,000 under the proposed guidance. Consistent application of this presumption across the new threshold will allow members to plan and document their qualified activities with confidence.	update BEA Program Application FAQs to provide further guidance on this comment.
Community Development Bankers Association (CDBA)	General Comments	We urge you to explicitly recognize purchases of BEA qualified loans as eligible activities would align with existing CDFI Fund guidance and promote secondary market activity, liquidity for originators, and increased lending in Distressed Communities. We believe appropriate safeguards should ensure that loans are not counted more than once for BEA credit, even if they are subsequently purchased by another institution.	The CDFI Fund will take this comment into consideration to inform future policy and program design decisions.