

Bank Enterprise Award Program (BEA Program)

ELIGIBILITY DATA TRANSITION FREQUENTLY ASKED QUESTIONS (FAQS)

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1. <u>BACKGROUND ON THE TRANSITION TO UPDATED ELIGIBILITY DATA FOR THE</u> <u>BEA PROGRAM</u>

BEA Program Eligibility Data is being updated as part of a larger effort undertaken by the CDFI Fund to ensure that the data used to determine the eligibility for the programs that it administers is current. This document is intended to address questions and provide general guidance to Applicants, award Recipients and other stakeholders on the CDFI Fund's release of the updated BEA eligibility data. Contact information has been provided in Question 11 for answers to questions not addressed in this document.

2. WHAT DOES THE UPDATED ELIGIBILITY DATA MEAN FOR THE BEA PROGRAM?

The CDFI Fund previously announced the release of updated Eligibility Data for the BEA Program on July 29, 2013. The updated Eligibility Data was based on the Census Bureau 2006-10 American Community Survey (ACS) poverty and population data, and 2010 Bureau of Labor Statistics Current Population Survey (CPS) unemployment data. This data was first used by FY 2014 BEA Program Applicants and was subsequently used exclusively for the FY 2015, 2016 and 2017 BEA Program Funding Rounds.

BEA Program Eligibility Data is once again being updated. The updated Eligibility Data will be based on more recent, Census Bureau 2011-2015 ACS poverty and population data, and 2015 Bureau of Labor Statistics Current Population Survey (CPS) unemployment data. FY 2018 BEA Program Applicants will have the opportunity to use the updated Eligibility Data (hereafter referred to as "2011-2015 BEA Eligibility Data") to determine whether a transaction occurred in a Qualified BEA Distressed Community.

3. WILL THE RELEASE OF THE UPDATED ELIGIBILITY DATA CHANGE HOW THE CDFI FUND DEFINES A 'QUALIFIED DISTRESSED COMMUNITY' FOR THE BEA PROGRAM?

No. The release of the updated 2011-2015 BEA Eligibility Data will have no impact on how the CDFI Fund defines a Qualified Distressed Community for the BEA Program. The definition of a BEA Qualified Distressed Community is statutory and will not change. The updated 2011-2015 BEA Eligibility Data is subject to the same statutory requirements as the legacy data; however, it reflects more recent information obtained from the Census Bureau and Bureau of Labor Statistics.

The BEA Program statute defines a Qualified Distressed Community as a census tract that meets the following Area (Geographic) and Eligibility (Economic) requirements:

• Area (Geographic) requirements:

- Must be an area that is located within the jurisdiction of one (1) Unit of General Local Government (i.e. cannot cross county or state lines);
- The boundaries of the area must be contiguous; and

- The area must have a total population which meets <u>one</u> of the following:
 - At least 4,000, if within a Metropolitan Service Area (MSA) with a population of 50,000 or greater;
 - At least 1,000 if no portion is located near a MSA; or
 - Be located within an Indian Reservation.

• Eligibility (Economic) requirements:

- At least 30% of population has incomes which are less than the national poverty level; and
- Unemployment rate is at least 1.5 times the national average.

4. <u>How do i use the eligibility data to determine if a transaction is in</u> <u>A QUALIFIED DISTRESSED COMMUNITY?</u>

The CDFI Fund decided to release the updated data as early as possible and incorporate a transition period to allow Applicants, award Recipients and other stakeholder's sufficient time to review the data, and plan their loans and investments accordingly. For more information on the transition period, please see Question 5.

The updated 2011-2015 BEA Eligibility Data has been uploaded into the CDFI Fund's Information Mapping System (CIMS). It is also available in tabular form on the CDFI Fund's website and can be accessed using the following link and scrolling to the "Program Eligibility Guidance" section:

https://www.cdfifund.gov/research-data/Pages/default.aspx

Applicants that do not know the census tract number associated with an address must use CIMS to geocode the address and obtain the 11 digit census tract number. CIMS will also provide information on whether the census tract is Fully, Partially or Not Qualified. CIMS also indicates whether a Partially Qualified census tract ultimately qualifies for the BEA Program based on contiguity. CIMS will not, however, indicate whether a census tract is in an area that meets Persistent Poverty County criteria. This information is only available in the tabular data.

When using the tabular data, Applicants must first obtain the 11 digit census tract number. Once the 11 digit census tract number is known, Applicants can use the tabular data to determine: whether the census tract is Fully, Partially or Not Qualified; whether it qualifies based on contiguity; and finally, whether it is within an area designated as a Persistent Poverty County.

5. WILL THERE BE A TRANSITION PERIOD?

Yes. There will be a transition period for the use of the updated 2011-2015 BEA Eligibility Data. FY 2018 Applicants will have the opportunity to use either the updated 2011-2015 BEA Eligibility Data or the legacy, 2006-2010 BEA Eligibility Data, to determine if a transaction or activity occurred in a Qualified BEA Distressed Community. Both data sets

are available in CIMS and in tabular form on the CDFI Fund's website. A link to the page of the CDFI Fund's website where the tabular data is located was provided in Question 4. Future Applicants and CDFI Partners are advised that a full transition to the updated eligibility data will take place in the FY 2019 BEA funding round. FY 2019 Applicants will be required to exclusively use the updated 2011-2015 BEA Eligibility Data.

6. <u>My organization received a FY 2017 BEA Program Award. which</u> <u>data should I use when determining where to deploy my award and</u> <u>when completing the use of award reporting form?</u>

FY 2017 BEA Program Applicants did not have access to the updated 2011-2015 BEA Eligibility Data and exclusively used the legacy 2006-2010 BEA Eligibility Data to determine whether a transaction occurred in a Qualified Distressed Community and when completing "Table 8: Projected Use of BEA Program Award". Therefore, FY 2017 BEA Program award Recipients will be required to continue to use the legacy 2006-2010 BEA Eligibility Data to determine where to deploy their BEA Program Awards and when completing the Use of Award reporting form in the CDFI Fund's Award Management Information System (AMIS).

7. IF MY ORGANIZATION IS SELECTED TO RECEIVE A FY 2018 BEA PROGRAM AWARD, WHICH DATA SHOULD I USE WHEN DETERMINING WHERE TO DEPLOY MY AWARD AND WHEN COMPLETING THE USE OF AWARD REPORTING FORM?

FY 2018 Applicants will have the ability to use either the updated 2011-2015 BEA Eligibility Data or the legacy, 2006-2010 BEA Eligibility Data, to determine if a transaction or activity occurred in a BEA Qualified BEA Distressed Community. FY 2018 Applicants that are selected to receive a BEA Program Award will also have the ability to use either the updated 2011-2015 BEA Eligibility Data or the legacy, 2006-2010 BEA Eligibility Data, to determine where to deploy their BEA Program Award and when completing the Use of Award reporting form in AMIS.

8. <u>BACKGROUND ON PERSISTENT POVERTY COUNTIES (PPC)</u>

The CDFI Fund's appropriation legislation in the Consolidated Appropriations Act, 2018 (Public Law Number 115-141), enacted March 23, 2018, requires that at least 10 percent of BEA Program Awards be used for projects that serve populations living in Persistent Poverty Counties (PPCs). Since the CDFI Fund must ensure that this Congressional mandate is met, these commitments will be considered when making Award decisions. If the CDFI Fund should determine, upon initial analysis of the pool of Award Recipients, that the 10 percent PPC requirement has not been met, preference will be given to Applicants that committed to deploying at least 10 percent of their BEA Program Award to PPCs. Applicants that commit to serving PPCs and are selected to receive an FY 2017 and/or FY 2018 BEA Program Award, will have their PPC commitment incorporated into their Award

Agreement as a performance goal which will be subject to compliance and reporting requirements.

9. <u>WILL THE UPDATED ELIGIBILITY DATA AFFECT PERSISTENT POVERTY</u> <u>COUNTY (PPC) DESIGNATION?</u>

No. The updated 2011-2015 BEA Eligibility Data will not affect the Persistent Poverty County designation.

10. How do I identify a Persistent Poverty County (PPC)?

The tabular versions of both data sets (i.e., updated 2011-2015 BEA Eligibility Data and legacy, 2006-2010 BEA Eligibility Data) indicate whether a census tract is part of an area designated as a Persistent Poverty County. A link to the page of the CDFI Fund's website where the tabular data is located was provided in Question 4.

11. WHO SHOULD I CONTACT IF I HAVE ADDITIONAL QUESTIONS?

You may contact the CDFI Fund Help Desk by submitting a service request in AMIS.