COMMUNITY DEVELOPMENT FINANCIAL INSTITUTIONS FUND

www.cdfifund.gov



Frequently Asked Questions (FAQs): CDFI/NACA/RRP Transaction Level Report (TLR)

December 2022

OMB Approval No. 1559-0027

Paperwork Reduction Act Notice. This compliance reporting document is provided to award Recipients of CDFI and NACA Program Financial Assistance through the CDFI/NACA Program. Award Recipients are not required to respond to the associated collection of information unless it displays a currently valid Office of Management and Budget (OMB) control number. The estimated average burden with this associated collection of information is 40 hours per Transaction Level Report. Comments concerning the accuracy of this burden estimate and suggestions for reducing this burden should be directed to the Program Manager, Financial Strategies and Research, Department of the Treasury, Community Development Financial Institutions Fund, 1500 Pennsylvania Avenue, Washington, D.C. 20220.

Freedom of Information Act (FOIA) Statement:

The CDFI Fund does not publish proprietary or confidential information submitted by CDFIs as a general practice. However, any information submitted by CDFIs in the Transaction Level Report (TLR) or other reports made in connection with TLR (e.g., Consumer Loan Table (CLR)) is subject to the Freedom of Information Act (FOIA) (5 U.S.C. 552) and other federal laws and regulations. In general, FOIA makes federal agency records available to the public, unless the information requested is exempt from disclosure. Trade secrets and commercial or financial information submitted by CDFIs may be exempt from disclosure pursuant to the FOIA. CDFIs should consult their legal counsel for further guidance on this matter.

The CDFI Fund reserves the right to publish responses to select questions provided during the reporting process. This information may include, but may not be limited to organization name, date Certified, financial institution type, organization's address and organization's website.

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NOTE: This document is intended to serve as public guidance for the subject matter contained herein. The CDFI Fund reserves the right to modify this guidance at any time upon public notice. The examples contained in this guidance are not exhaustive in nature and the CDFI Fund has the discretion to consider additional factors when determining matters of compliance. All capitalized terms used throughout the document are defined in the CDFI statute, regulations and related guidance.

Questions on TLR Procedures:

1. Do I need to submit a TLR this year?

Check your Assistance Agreement or reporting schedules in AMIS. Both schedules list all reports that an organization is required to submit.

2. I only use the TLR to report on loans and investments using CDFI Fund's awards. Is that correct?

No. As an award Recipient, an organization is required to report ALL new loans, regardless of funding sources, originated during the organization's reporting period.

3. What is my reporting period?

Check your Assistance Agreement or AMIS account for your reporting period. Usually, but not always, it is your fiscal year.

4. I already submitted my TLR report. Why does my reporting schedule still show "Pending"?

It could be that some of the TLR records were not certified. Review all of your TLR records to make sure they are certified after you hit the submit button. If you see uncertified records, you will need to resubmit them for certification.

5. If I encounter a technical issue(s) prior to the TLR submission deadline that will prevent me from submitting the TLR by the deadline, how should I proceed?

First, you should submit an AMIS Service Request to the CCME Queue requesting an extension on your submission deadline. All requests must be submitted prior to the applicable reporting deadline. In order for the CDFI Fund to consider providing an extension, a Service Request must be submitted through AMIS with the following information:

- 1. Impacted award number(s) and report control number(s) (e.g., RS-0012345);
- 2. Description of the technical difficulties; and
- 3. Screen shots of the issue or error messages.

The CDFI Fund will review these requests as quickly as possible and work to provide a timely response, through AMIS.

Please note that on a case-by-case basis the CDFI Fund will evaluate requests for extensions from Recipients that experience technical difficulties submitting required compliance reports. Recipients impacted by technical difficulties may be granted a one-time, one-month extension to submit their reports.

Questions on TLR Content:

6. Should I include refinanced or renewal loans in the report?

No, do not submit refinanced or renewal loans unless they involve new or additional funding/credits. If that is the case, then only report the net increases of the funding/credits.

7. I increased the loan amount for a borrower this year. Should I report the total amount or just the net increase?

You should only report the net increase.

8. I closed a loan within my reporting period. However, it is not disbursed yet. Should I include it in the report?

As long as a loan was closed during the reporting period, it should be reported.

9. Our organization received two CDFI/NACA Financial Assistance (FA) awards. Do I need to submit two separate TLR reports, one for each award?

No. An organization should submit only one TLR report per fiscal year.

10. I already reported a loan in last year's TLR report. Should I report it again this year?

No. You should only report on NEW loans and investments originated during your reporting period.

11. My organization only made loans to individuals such as consumer loans. Should I report an individual's physical address?

No. For loans to individuals such as consumer or home purchase loans, you should geocode the borrowers' addresses in AMIS in order to obtain their respective FIPS codes. Once you have their FIPS codes, these number combinations should be submitted in place of the borrowers' addresses.

12. My organization only made loans to businesses. Should I report the businesses' physical addresses?

Yes. For loans to businesses such as micro loans, you should provide either their physical addresses or X-Y coordinates, but not both.

13. Do I need to report loans in the Consumer Loans/Investments Originated (CLR) table?

The CLR table is only for banks and credit unions. If you are a bank or a credit union with consumer loan activity, you must use this file template to submit your consumer loans. If you are neither a bank nor a credit union, you should submit all of your loans in the CDFI TLR Project file template.

14. How do I allocate transactions to certain Performance Goals and Measures (PG&Ms) so that I do not double-count the transactions?

Transaction dollars cannot be double-counted. All CDFI RRP Financial Products will be reported in the annual Transaction Level Report (TLR) data, which must be submitted as part of Recipients' annual compliance reporting requirements. In terms of reporting and meeting PG&Ms, eligible transactions reported in the TLR data will be coded by Recipients by Award type, including CDFI RRP, Base-FA, or one of three FA Supplemental Programs: Persistent Poverty Counties-Financial Assistance (PPC-FA), Disability Funds-Financial Assistance (DF-FA), or Healthy Food Financial Initiative-Financial Assistance (HFFI-FA).

As Recipients with multiple Award/program types think about how their Financial Products are meeting PG&Ms, it can be helpful to think about meeting Supplemental Programs' PG&Ms and CDFI RRP PG&Ms before meeting Base-FA PG&Ms. In other words, if transactions are eligible for multiple Award/program types, Recipients could code them in the TLR first for eligible Supplemental FA PG&Ms, then CDFI RRP PG&Ms, and finally Base-FA PG&Ms.

PG&M benchmarks for overlapping Period of Performance (PoP) years are not cumulative. For PoP years in which an organization has overlapping PG&M benchmarks, it must meet the highest benchmark for the overlapping PoP years to be in compliance with all active awards. However, please keep in mind that an Applicant with overlapping PG&M benchmarks can be in compliance with one or more active awards, but may not necessarily be in compliance with other active award(s) for that PG&M.

See CDFI & NACA Program Financial Assistance (FA) Application Guidance and the CDFI Program & NACA Program Frequently Asked Questions documents posted on the Fund's <u>website</u> for additional assistance.

15. Should I report on the TLR any loans that were purchased?

No, loan purchases from another entity should not be reported on the TLR.

16. How do I report participation loans in the TLR?

For loan participations, an entity should report only their portion of the loan participation.

17. How do I complete the "Original Loan/Investment Amount" data field for lines of credit (LOCs)?

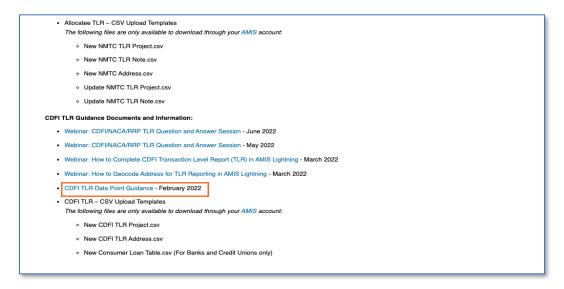
For LOCs such as credit cards, report the credit limit amount at time of origination. If the credit limit amount is unknown, then enter a value of "1" for the data field.

Questions on TLR Technical Issues:

18. Where can I find instructions regarding TLR upload?

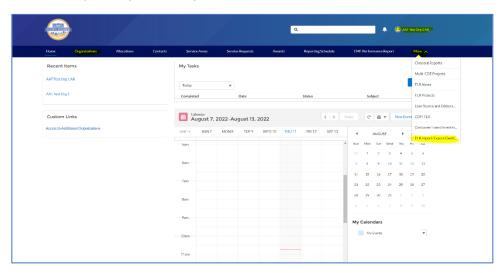
Go to this website: https://www.cdfifund.gov/amis-reporting.

Here, you will find a document with the name "CDFI TLR Data Point Guidance" as well as other links to videos with instructions on how to perform additional steps regarding the TLR upload.

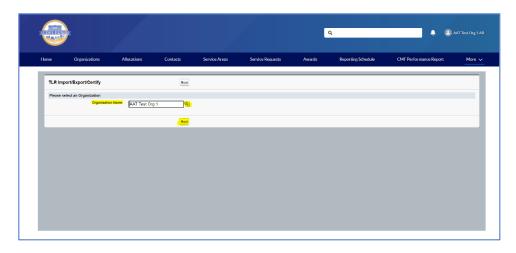


19. Where can I find the TLR Data Export templates in AMIS?

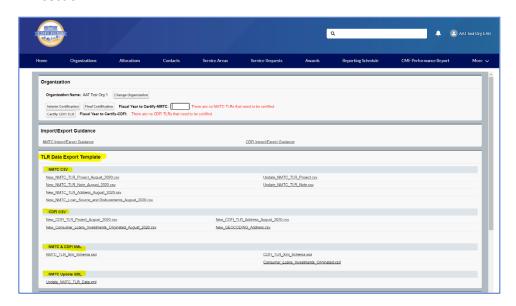
a. Login to AMIS, Click the dropdown button next to "More" on the Navigation Bar. Then, select the "TLR/Import/Export/Certify" Tab.



b. Input your organization's name and click on the magnifying glass and select your Organization from the list. Then, click "Next."



c. Click on the link of the template you wish to download from the "TLR Data Export Template" section.



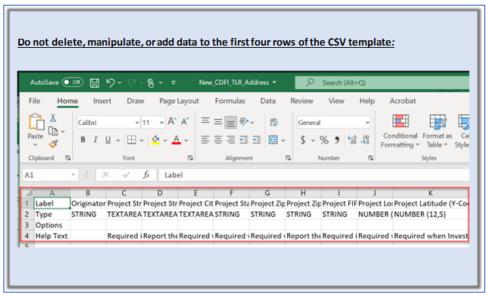
20. Is there a specific order to import my CDFI TLR files?

Yes, import the files in the following order:

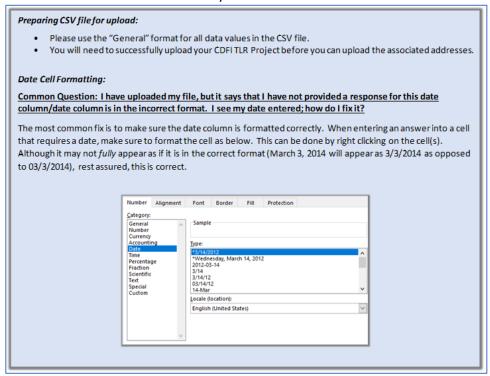
- a. Import the Geocoding data for the FIPS code if you need to obtain FIPS code for loans to individuals.
- b. Import Consumer Loans records if you are a bank or a credit union.
- c. Import the CDFI TLR records.
- d. Import CDFI TLR Address records.

21. How do you validate your TLR before uploading? CDFI TLR Projects

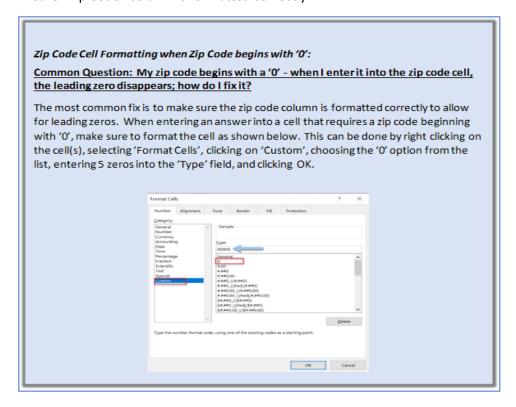
a. Ensure there is no data in the "Label" Column



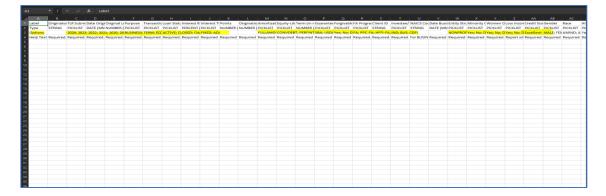
b. Ensure dates are formatted correctly.



c. Ensure "Zip Code" column is formatted correctly.



- d. Ensure "Originator Transaction ID" and "Client ID" start with a letter.
- e. Avoid duplicates when it comes to Originator Transaction IDs. If you see "Originator Transaction ID" already exists, this means you already uploaded records using that "Originator Transaction ID".
- f. Ensure "Original Loan/Investment Amount," "Origination Fees," "Annual Gross Revenue from Business Operation," and "Total Project Cost" are in General format (not Numbers or Currency).
- g. If receiving an "Invalid Picklist" error, be sure to use a value on the third row of the column.

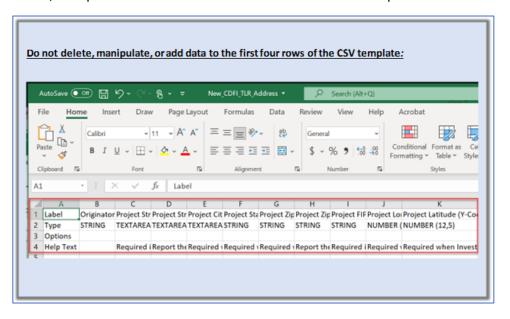


CDFI TLR Addresses

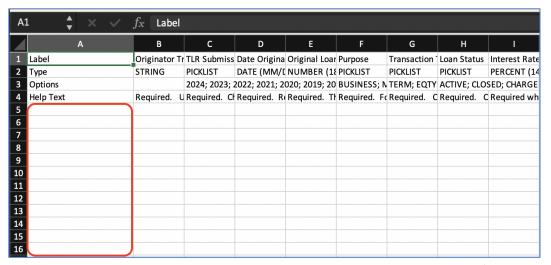
- a. Ensure that "Project Zip Code," "Project Zip Code Plus 4," and "FIPS Code" have the leading 0s if necessary.
- b. The "Originator Transaction ID does not exist" means the CDFI TLR Project did not successfully upload.
- c. Ensure that apartment and suite numbers are entered in the "Project Street Address Line 2" column.
- d. Make sure to not have any special characters in the address.

22. What are the most common reasons for the TLR data fail to load?

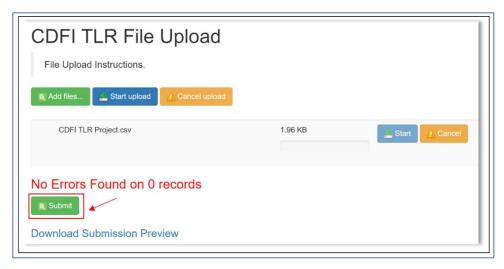
- a. The "Amount" column has decimal values instead of being a whole number.
- b. Leading zeroes are being removed in Excel for "FIPS Code," "Zip Code," etc.
- c. If the CDFI TLR Address record has the "Investee/Borrower Type" equal to IND, then only the "FIPS Code" is needed (remove address and coordinates).
- d. When importing CDFI TLR, CDFI TLR Address, or Consumer Loans/Investments Originated records do not delete, manipulate or add data to the first rows of the CSV template.



e. When importing "CDFI TLR, CDFI TLR Address," and "Consumer Loans/Investments Originated" records, please do not add any values to row 5 and below (6, 7, 8, etc.) in column A.



f. After uploading the records for CDFI TLR, CDFI TLR Address, or Consumer Loans/Investments Originated records, ensure that you click the "Submit" to complete the process of creating the records in the system.



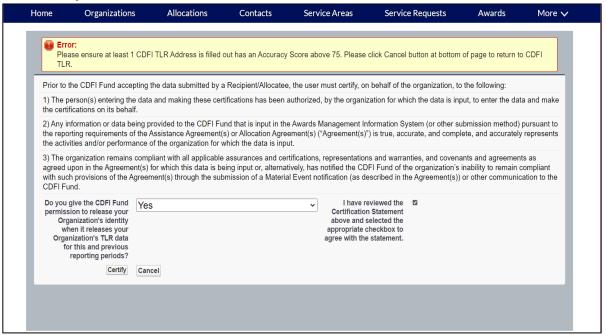
- g. The X and Y coordinates in the TLR Address import file can only have a maximum of 5 digits after the decimal point.
- h. When the user attempts to upload TLR Address records before uploading TLR records.
- i. The user includes an "Investee/Borrower Type" value that is incompatible with the "Purpose" value. For Individual investees ("Investee/Borrower Type" = IND), select CONSUMER, HOMEPURCH, HOMEIMP, OTHER, or MICRO. For CDFI Investees ("Investee/Borrower Type" = CDFI), select OTHER. For Business Investees ("Investee/Borrower Type" = BUS), select BUSINESS, RECOCOM, RECOMULTI, RECOSINGLE, RERHCOM, RERHMULTI, RERHSINGLE, OTHER or MICRO.

23. What is the process that Banks or Credit Unions should follow if they only have consumer loan data to report?

a. Import Consumer Loan records into AMIS.

b. Open a Service Request requesting the Help Desk to certify the records and update the Reporting Schedule.

24. What do I do if I receive the error "Please ensure at least 1 CDFI TLR Address is filled out has an Accuracy Score above 75."?



- a. Ensure you have included an address. This is required.
- b. Avoid using initials for directions, such as "E, S, N, W" use "East, South, North, West."
- c. For zip codes with 4 digits, use a leading zero "0."
- d. If the address contains a suite or unit number, it should be used on address line 2.
- e. For the problematic addresses such as highways, XY coordinates are important.
- f. The coordinates in the TLR Address import file can only have a maximum of 5 digits after the decimal point.
- g. If the CDFI TLR Address record has the "Investee/Borrower Type" equal to IND, then only the "FIPS Code" is needed (remove address and coordinates).
- h. Business loans require an address or XY coordinates.

25. What is the difference between business and individual loan addresses?

The Individual loans cannot have an address due to privacy data and only a "FIPS Code" is accepted. The business loans require an address or XY coordinates.

26. Why can't I certify my TLR?

If you are unable to certify the TLRs, please go over the following checklist:

a. Make sure the box next to "Fiscal Year to Certify-CDFI" is **not** empty. If it is empty, that means you do not have any TLRs to be certified for that year.



- b. Check the "Due Date" on the Reporting Schedule to ensure that you are uploading the TLRs for the correct year and within the correct timeframe.
- c. Please make sure you have addressed all the errors on each TLR during the upload.
- d. Please make sure each TLR has an accurate address associated with it.

27. How do I fix the "Originator transaction ID already exists"?

When an error message stating "Originator Transaction ID already exists," it means you have previously uploaded records using the same "Originator Transaction ID." You need to go to the already uploaded data that has the same "Originator Transaction ID" and make the necessary changes.

28. How do I fix "FIPS already reported or duplicate FIPS"?

- a. Consumer loan records CANNOT use the same FIPS Codes as another consumer loan record for the same Fiscal Year.
- b. If you have loans with the same FIPS Codes, then the amounts and the number of loans need to be added together for the FIPS Code.

29. How should I submit my TLR if I am a Depository Institution Holding Company?

- a. Submit your TLR under the Affiliate's account.
- b. Create a Service Request in AMIS asking the Help Desk to certify those records and update the reporting schedule of the Depository Institution Holding Company.

30. When a Bank or Credit Union attempts to certify the TLR and receives notice that a Consumer Loan/Investment table is required, how does it complete the TLR if it does not have any consumer loans to report?

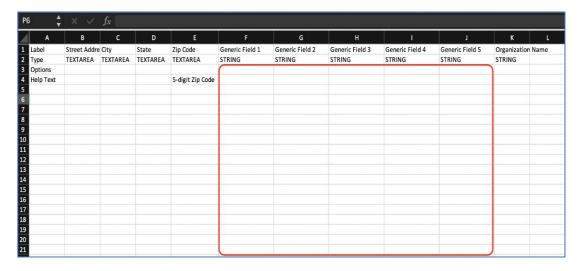
- a. If you do not have consumer loans to report, you will not be able to certify all your records. This would have to be done by a Systems Administrator.
- b. Create a Service Request in AMIS for this issue and assign it to Technical Issues.

31. CDFI TLR is marked as "pending receipt," what should I do?

- a. As an external user, you will not be able to edit the Reporting Schedule.
- b. First, verify your TLRs have been certified by going to the CDFI TLRs tab. Next, see if your new TLRs are certified.
- c. If these CDFI TLRs are certified, you will need to put in a Service Request in AMIS as a technical issue stating that the report schedule needs to be updated from Pending Receipt to Submitted.

32. If Geocoding Data is being imported for multiple organizations, how do we determine which data is for which organization?

a. Use the five generic text fields to put in information to signify which batch was uploaded.



- b. Reference the created date field for Geocoding Data records.
- c. Export it using Excel and manipulate or delete the data.

33. If none of the fixes described here solve my TLR technical issues, what should I do?

Any entity who continues to experience technical issues should create an AMIS Service Request and assign it to Technical Issues.