



2016-2020 AMERICAN COMMUNITY SURVEY (ACS) DATA FREQUENTLY ASKED QUESTIONS

COMMUNITY DEVELOPMENT FINANCIAL INSTITUTION INVESTMENT AREA
AND BANK ENTERPRISE AWARD PROGRAM TRANSITION

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CDFI FUND
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General Questions Across all Programs

1. Why is the Community Development Financial Institutions Fund (CDFI Fund) updating the eligibility data for various programs?

The CDFI Fund is updating eligible data using the U.S. Census Bureau's 2016-2020 American Community Survey (ACS) 5-year estimates to provide more current socioeconomic and demographic data that reflect changes since the 2011-2015 ACS 5-year estimates eligibility data was posted on the CDFI Fund's website. The CDFI Fund revises program eligibility criteria to coincide with each subsequent full five-year ACS data release, which is the 2016-2020 release. Please note that the CDFI Fund will not update the eligibility data annually because of the cost and complexity in terms of compliance and Information Technology resources. The next CDFI Fund eligibility data ACS update is planned to coincide with the 2021-2025 five-year ACS data release.

2. I notice some census tracts in the file have poverty or median family income listed as zero, blank, or "N/A." What is the reason for this?

The ACS data set released by the U.S. Census Bureau contains census tracts with no data on poverty or income. A significant majority of these census tracts have no population or a very low population. The Census Bureau was unable to estimate income or poverty for these census tracts. The remainder has a population that is largely housed in group quarters, such as prisons or college dorms, which are not included in the ACS income or poverty calculations.

3. Where can I find a reference data file with updated eligible Investment Area Census Tract data based on the 2011-2015 and 2016-2020 ACS?

Excel reference files with eligible Investment Areas census tracts can be found at the following link: <https://www.cdfifund.gov/documents/geographic-reports>. The Excel files contain a list of eligible census tracts based on both the 2011-2015 and 2016-2020 ACS 5-year estimates. The 2000, 2010, and 2020 census tract Excel files are available for historical and auditing purposes for older transactions. Please note that the CDFI Information Mapping System (CIMS) uses the ACS data and all of the eligibility factors identified above to compile the new Investment Area and Target Market maps. The applicant may rely on CIMS to compile Investment Areas and Target Markets and does not need to use the spreadsheet to determine eligibility. The spreadsheets are provided as a reference to document the underlying data used to compute eligibility.

4. When will updated Island Area data be released?

The U.S. Census Bureau released updated 2020 Island Area data for census tracts as part of the Demographic and Housing Characteristics File (DHC) in July 2023. The CDFI Fund released updated Island Area data on December 19, 2023, in Excel format at the following link: https://www.cdfifund.gov/sites/cdfi/files/2023-12/CDFI_Investment_Areas_Territory_2020_December_2023.xlsx. The BEA data was posted on January 12, 2024, in Excel format at the following link: https://www.cdfifund.gov/sites/cdfi/files/2024-01/BEA_Program_Eligibility_Data_2020_Island_Areas.xlsx. CDFI and BEA territory data are available in CIMS and AMIS.

5. Will the updated Island Area eligibility data be uploaded into CIMS for geocoding?

Yes. The Island Area eligibility data has been uploaded into CIMS as of January 24, 2024.

6. How do I contact the CDFI Fund Help Desk if I have any additional questions?

You may submit a Service Request through the CDFI Fund's Awards Management Information System (AMIS), contact the CDFI Fund Help Desk by phone at (202) 653-0421, or by email CDFIHelp@cdfi.treas.gov. For questions on applicability to a specific CDFI Fund program, you should direct your AMIS Service Request to that program's specific queue. For questions on applicability to CDFI Certification and Compliance issues, then your AMIS Service Request should be direct to the CCME queue. For questions on the data itself, you should direct your request to the FS&R queue, For Technical Support with CIMS, please contact the CDFI Fund IT Help Desk at (202) 653-0300 or by email ITHelpDesk@cdfi.treas.gov.

7. Will Opportunity Zones be updated with the 2016-2020 ACS data?

Opportunity Zones (OZs) will not be updated using the 2016-2020 ACS data. Per the Tax Cuts and Jobs Act of 2017 (Pub. L. 115-97), the designation of OZ was a one-time event. The designation of OZ was done through the utilization of 2015 ACS census tract boundaries, which are based on 2010 census tracts. The 2016-2020 ACS data is based on 2020 census tracts and, due to boundary and number changes between the different data sets, there is no crosswalk table for the two data sets. Users may report 2015 ACS census tracts and can maintain XY coordinates or addresses as a record in case of an audit.

8. Will guidance be provided in Notice of Funding Availability, Notice of Allocation Availability, etc.?

Each CDFI Fund program, may provide additional guidance in an applicable Notice of Allocation Availability (NOAA), Notice of Funds Availability (NOFA), or Notice of Guarantee Availability (NOGA). Users should refer to specific program guidance on the applicability of 2016-2020 ACS data.

9. When will the 2016-2020 ACS data be available in AMIS for TLR reporting?

The 2016-2020 ACS data is available in the Awards Management Information System (AMIS) for the opening of the 2023 reporting cycle for the Community Development Financial Institutions Program (CDFI Program), Native CDFI Assistance Program (NACA Program), and CDFI Rapid Response Program (CDFI RRP) Transaction Level Report (TLR). Award recipients should continue to use the 2011-2015 census tracts for the TLR submissions until notified otherwise by the CDFI Fund.

10. Will Persistent Poverty Counties be updated based on 2016-2020 ACS data?

Yes, the definition of Persistent Poverty Counties (PPCs) was updated by Congress in December 2022. The updated PPC definition as defined by Public Law Number 117-328 (enacted 12/29/2022) for the CDFI Fund is "any county, including county equivalent areas in Puerto Rico, that has had 20% or more of its population living in poverty over the past 30 years, as measured by the 1990 and 2000 decennial censuses and the 2016-2020 5-year data series available from the American Community Survey of the Bureau of the Census or any other territory or possession of the United States that has had 20% or more of its population living in poverty over the past 30 years, as measured by the 1990, 2000 and 2010 Island Areas Decennial Censuses, or equivalent data, of the Bureau of the Census."

The PPC determinations for U.S. territories are based on territory-wide data from the Island Area Censuses. CDFI Program and NACA Program Financial Assistance Applicants should note that PPC transactions do not need to be located in their approved Target Market, but must be in an Eligible Market and a PPC County.

The updated PPCs based on 2016-2020 ACS data are available [here](#). Please refer to guidance from each CDFI Fund program for PPC applicability.

11. Will High-Poverty Areas be updated based on 2016-2020 ACS data?

Yes, the definition of High-Poverty Areas (HPAs) was updated by Congress in December 2022. High-Poverty Areas are defined by Public Law Number 117-328 (enacted 12/29/2022) and House Appropriations Committee Report and Joint Explanatory Statement for the CDFI Fund as "any census tract with a poverty rate of at least 20% as measured by the 2016-2020 5-year data series available from the American Community Survey of the Bureau of the Census for all States and Puerto Rico or with a poverty rate of at least 20% as measured by the 2010 Island Areas Decennial Census data for any other territory or possession of the United States."

The updated High-Poverty Areas based on 2016-2020 ACS data are available [here](#). Please refer to guidance from each CDFI Fund program related to High-Poverty Areas for applicability.

12. When was BEA Program and Community Development Financial Institution (CDFI) Investment Area 2016-2020 ACS data released?

The BEA Program and CDFI Investment Area 2016-2020 ACS data was released on January 5, 2023. See <https://www.cdfifund.gov/news/498>.

13. Will the delay in the implementation of the new certification policies impact the use of 2016-2020 ACS data?

Beginning on January 5, 2024, organizations will be required to utilize the 2016-2020 ACS dataset to validate activity in their Target Market. This date is one year after the CDFI Fund released the new 2016-2020 ACS dataset on its website. After January 5, 2024, CDFIs that are not using the 2016-2020 ACS data to analyze their Investment Area(s) or have not submitted a Target Market Modification Application requesting a change to an Investment Area, will be out of compliance with the terms of their CDFI Certification and may be in jeopardy of losing their CDFI Certification status.

Currently Certified CDFIs, who are reaffirming their Target Market in their Annual Certification and Data Collection Report (ACR), may use either the 2011-2015 ACS data or 2016-2020 ACS data to identify their Investment Areas and Target Market. Once a currently Certified CDFI submits their new CDFI Certification Application, they will be required to use the 2016-2020 ACS data to identify their Investment Areas and Target Market.

14. How is the CDFI Fund handling the changes to county equivalents in Connecticut with the 2016-2020 ACS data?

In September 2023, the Census Bureau replaced the eight county-equivalent geographic units for Connecticut with the state's Council of Governments (COGs)/planning regions. However, since this change occurred after the release of the CDFI Fund census tract eligibility data in CIMS and AMIS, and the posting of the program geographic eligibility Excel files on the CDFI Fund website, the Fund will continue to use the legacy county data for Connecticut. The Census Bureau notes that "Previously released ACS data products are not typically re-released following changes in geographic definitions." See [Change to County-Equivalents in the State of Connecticut for 2022 ACS \(census.gov\)](#).

Community Development Financial Institution Investment Area ACS Eligibility Data

1. What is a CDFI Investment Area?

Investment Areas are defined in the Code of Federal Regulations at 12 C.F.R. §1805.201(b)(3)(ii). A CDFI Investment Area is defined as a geographic unit (or contiguous geographic units), such as a census tract, located within the United States, that meets at least one of the following criteria:

- Has a population poverty rate of at least 20%;
- Has an unemployment rate 1.5 times the national average;
- For a Metropolitan area has a median family income (MFI) at or below 80% of the greater of either the Metropolitan or national Metropolitan MFI;
- For a Non-Metropolitan area that has an MFI at or below 80% of the greater of either the statewide or national Non-Metropolitan MFI;
- Is wholly located within an Empowerment Zone or Enterprise Community; or
- Has a county population loss greater than or equal to 10% between the two most recent census periods for Metro areas or 5% over last five years for Non-Metro areas. For Non-Metropolitan counties, the criteria is the same as census tracts.

2. What is a CDFI Target Market?

A Target Market refers to one or more Investment Area(s) and/or Targeted Population(s). Targeted Populations may include Low-Income Targeted Populations (defined based on income) or Other Targeted Populations (an identifiable group of individuals in the organization's service area, for which there exists a strong basis in evidence that the group lacks access to loans, equity investments, and/or financial services).

To be certified as a CDFI, the potential applicant must be actively engaged in providing Financial Services and/or Financial Products to its Target Market as of the date the CDFI Application is submitted to the CDFI Fund. The Applicant must demonstrate that a minimum of 60% of its financing activities are to its Target Market(s). A Certified CDFI may request to modify its Target Market(s) after its initial certification, as the areas and populations it serves change. However, a Certified CDFI must continue to meet the 60% threshold to maintain its certification. Please refer to the to the final CDFI Certification policies for additional information.

3. Is the 2016-2020 ACS CDFI Investment Area data available for identifying Target Market and for geo-coding in CIMS to identify the 2020 census tract in which the transaction occurs?

The CDFI Fund has updated CIMS with the 2016-2020 ACS data applied to the 2020 census tracts. The CIMS mapping program will allow you to identify your Target Market for a new CDFI Certification Application or for reaffirming the Target Market for the Annual Certification and Data Collection Report (ACR). The updated CIMS will also enable you to identify the appropriate 2020 census tract by entering an address for uploading into the geocoder.

4. What does the new ACS census data mean for the CDFI Certification Program?

As of the posting of the updated data (January 5, 2023), new CDFI Certification Applicants will be required to use

2016-2020 ACS data to identify their Target Market (e.g. Investment Area, Low Income Targeted Population, Other Targeted Population) with the submission of the new CDFI Certification Application expected to deploy in fall 2023.

Currently Certified CDFIs, who are reaffirming their Target Market for the ACR, may use either the 2011-2015 ACS data or 2016-2020 ACS data to identify their Target Market. A one-year transition period will be allowed. Once a currently Certified CDFI submits their new CDFI Certification Application, they will be required to use the 2016-2020 ACS data to identify their Investment Areas and Target Market.

Any applicant for CDFI Certification that submitted a Certification Application or Target Market Modification Application to the CDFI Fund prior to October 1, 2022 and is awaiting a final determination need not reapply using the 2016-2020 ACS data to define an Investment Area. The CDFI Fund will make a decision on certification based on the 2011-2015 ACS Census data.

5. What does the ACS census data mean for CDFI Program and NACA Program Financial Assistance (FA) and Technical Assistance (TA) Award Recipients?

A CDFI, whose Certification has been reaffirmed in the most recent ACR, may define its Target Market using the 2011-2015 ACS data, until it submits a new Certification Application. Once a CDFI's Certification Status is reaffirmed through the submission of the new Certification Application, then it is required to use the 2016-2020 ACS data going forward, and for reporting purposes should apply the new Target Market data to all existing awards, as well as any future awards.

An Award Recipient whose certification has not expired will be allowed to continue to conduct and report its qualified activities in the Target Market in which it is currently certified, until such time that the Award Recipient is recertified or otherwise modifies its Target Market.

6. What Target Market should a CDFI utilize for its CDFI or NACA Program application if it is submitting an application for CDFI recertification?

When discussing or referring to its Target Market in the CDFI or NACA Program Application, a CDFI or NACA Program Applicant that is being recertified may use its current Target Market for the purpose of the funding application; however, once recertified a CDFI must use its new Target Market when it is reporting on activity in its Target Market on all existing awards, as well as any future awards.

7. What information is included in the tabular data released on the CDFI Fund's website?

The updated CDFI Investment Area Program eligibility data file includes the following fields:

- 11 digit census tract;
- State the census tract is located in;
- County the census tract is located in;
- CDFI Investment Area Program eligibility determination;
- Core-Based Statistical Area (CBSA) metropolitan and micropolitan area designation for counties;
- Total population;
- Poverty rate;
- Indicator for whether the poverty rate is at least 20%;
- Census tract median family income;

- Metropolitan median family income;
- National metropolitan median family income;
- Statewide non-metropolitan median family income;
- National non-metropolitan median family income;
- Median family income share;
- Indicator for whether the share of median family income is at or below 80%;
- Unemployment rate;
- Unemployment rate ratio
- Indicator for whether the unemployment rate ratio is at least 1.5;
- Indicator for whether the Census tract is wholly located within an Empowerment Zone or Enterprise Community;
- Population loss rate; and
- Indicator for whether the Census tract is located in a county with population loss greater than or equal to 10% for Metropolitan areas or 5% for Non-Metropolitan areas.

Detailed descriptions on each of these fields are be contained in the “NOTES” tab.

8. What does the new 2020 ACS census data mean for the CDFI TLR?

For TLR reporting, a new set of census tracts became available in AMIS in September 2023. Award recipients can use the following timelines for guidance on the data they should use to qualify potential transactions.

- Any TLR submission whose submission due date is between August 31, 2023, and June 30, 2024, may use either the 2011-2015 ACS data or 2016-2020 ACS data for determining Investment Area eligibility.
- Any TLR whose submission due date falls after June 30, 2024, must use the 2016-2020 ACS data applied to the 2020 census tracts for determining Investment Area eligibility.

9. What does the new 2020 ACS census data mean for Performance Goals and Measures (PG&M) Reporting?

For TLR reporting, a new set of census tracts became available in AMIS in September 2023 and Applicants and Award recipients should follow guidance provided by the Fund’s Office of Compliance Monitoring and Evaluation unit.

Bank Enterprise Award Program ACS Eligibility Data

1. What Data Sources does the BEA Program rely on to determine “Qualified Distressed Communities”?

The BEA Program statute defines “Qualified Distressed Communities” as areas that meet 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); and

- The boundaries of the area must be contiguous; and
- The area must have a total population which meets one of the following criteria:
 - At least 4,000, if within a Metropolitan Service Area (MSA) with a population of 50,000 or greater; or
 - At least 1,000 if no portion is located in an MSA; or
- Be located entirely within an Indian Reservation.

Eligibility (economic) requirements:

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

The BEA Program is required by its authorizing legislation to obtain and use unemployment data from the Bureau of Labor Statistics.

Consistent with past practices and statutory and regulatory requirements, the updated BEA Program eligibility data was determined using a combination of Census Bureau poverty and population data and Bureau of Labor Statistics unemployment data. Updated population and poverty data was obtained from the Census Bureau’s 2016-2020 ACS data. To ensure close alignment with the Census Bureau’s 2016-2020 ACS data, Bureau of Labor Statistics Current Population Survey (CPS) unemployment rates for 2015 were used for the updated eligibility data.

2. Will the CDFI Fund’s definition of a BEA “qualified distressed community” change as a result of the updated eligibility data?

The CDFI Fund’s definition of a BEA “Qualified Distressed Community” is statutory and will not change as a result of the release of updated eligibility data. The updated eligibility data will be subject to the same statutory requirements as the legacy eligibility data; however, it will reflect more recent information obtained from the Census Bureau and Bureau of Labor Statistics.

Although the definition of a BEA “Qualified Distressed Community” will not change, applicants are advised that the updated eligibility data will likely result in some areas previously deemed eligible becoming ineligible and some areas previously deemed ineligible becoming eligible.

3. Will there be a transition period?

Yes. There will be a transition period to the updated eligibility data. The transition will begin in the fiscal year (FY) 2023 BEA Program funding round and is projected to be completed in time for the FY 2024 BEA Program funding round.

Future applicants are advised that a full transition to the updated eligibility data will take place for the FY 2024 BEA Program funding round.

4. How do I determine the eligibility of an activity or transaction that occurred in a census tract located in an American Indian Reservation?

The updated data indicates whether a census tract lies “fully” or “partially” within an American Indian Reservation. Applicants attempting to determine the eligibility of a transaction or activity that occurred in a census tract located in an American Indian Reservation are advised to review the census tract within an

American Indian Reservation of the updated eligibility data. Census tracts designated as being ‘fully’ within an American Indian Reservation are located entirely within a Reservation and are not subject to the population requirement. Census tracts designated as being ‘partially’ within an American Indian Reservation are not located entirely within a Reservation. Applicants attempting to determine the eligibility of these census tracts will need to confirm that the physical address of the activity or transaction is located within the Reservation. If the activity or transaction occurred within the reservation it will be treated the same as a census tract that is ‘fully’ within a reservation and not be subject to the population requirement.

5. What information is included in the tabular data released on the CDFI Fund’s website?

The updated BEA Program eligibility data file includes the following fields:

- 11 digit census tract;
- Name of the census tract including county and state where the census tract is located;
- BEA Program eligibility determination;
- Indicator for American Indian Reservation;
- Indicator for 20% Poverty rate criteria;
- Indicator for 30% Poverty rate criteria;
- Indicator for Population criteria;
- Indicator for Unemployment rate criteria;
- Indicator for Contiguity criteria;
- Qualifying Combination of Tracts;
- Metro Designation;
- Total Population;
- Unemployment Rate;
- Poverty Rate;
- Percentage of Benchmarked Median Family Income; and
- Indicator for Persistent Poverty County.

Detailed descriptions on each of these fields are be contained in the “Notes” tab.