

BANK ENTERPRISE AWARD PROGRAM

BEA PROGRAM

FREQUENTLY ASKED
QUESTIONS

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UPDATES

Questions 19 has been revised and Question 20 has been added. Updates in yellow.

FY 2024 BEA PROGRAM FREQUENTLY ASKED QUESTIONS

Questions on AMIS and Application Process

(1) How can my organization apply for a BEA Award?

If an organization intends to apply for a BEA Award, it must submit the required application documents through Grants.gov and the CDFI Fund's Awards Management Information System (AMIS). The CDFI Fund will not accept Applications via e-mail, mail, facsimile, or other forms of communication, except in extremely rare circumstances that have been pre-approved in advance by the CDFI Fund. Only the Authorized Representative or Application Contact Person designated in AMIS may submit the Application through AMIS. Applicant materials must be submitted by the deadlines below:

FY 2024 BEA Program Deadlines for Applicants

Document	Deadline	Time – Eastern Time (ET)	Submission Method
SF-424 Mandatory Form	May 28, 2024	11:59 pm ET	Electronically via Grants.gov
Create an Organization AMIS Account (if Applicant does not already have one) and enter EIN and UEI information	May 28, 2024	11:59 pm ET	Electronically via AMIS
Title VI Compliance Worksheet	June 25, 2024	11:59 pm ET	Electronically via AMIS
BEA Program Application	June 25, 2024	11:59 pm ET	Electronically via AMIS

For additional information about the content and form of Application submission, reference the FY 2024 BEA Program NOFA and the FY 2024 BEA Program Application Instructions.

Applicants must be registered in the System for Award Management (SAM), the award management system of the U.S. General Services Administration. Registration is a pre-requisite to applying for a BEA Program Award. For more information on SAM registration, see the Application Instructions document at <https://www.cdfifund.gov/bea> and visit SAM.gov. In order to submit an SF-424 in Grants.gov, an Applicant must have a current and valid UEI number and EIN, as well as an active SAM registration.

In addition, if you have not already done so, the CDFI Fund strongly encourages Applicants to start the Grants.gov and AMIS registration processes as soon as possible. For specific guidance on registering in Grants.gov, please visit Grants.gov. For specific guidance on using AMIS, see the

AMIS homepage: <https://amis.cdfifund.gov>. Please note the deadlines in the chart above related to Grants.gov and AMIS.

Multiple Applications from one organization (including its Affiliates and Subsidiaries) are not permitted. If an Applicant submits multiple SF-424s in Grants.gov, the CDFI Fund will only review the SF-424 submitted in Grants.gov that is attached to the AMIS Application. Applicants may only submit one Application through AMIS. Only those attachments requested by the CDFI Fund will be considered during the Application review process.

Each Applicant will receive an e-mail from Grants.gov immediately after submitting the SF-424 confirming that the submission has entered the Grants.gov system. This e-mail will contain a tracking number for the submitted SF-424. Within 48 hours, the Applicant will receive a second e-mail that will indicate if the submitted SF-424 was either successfully validated or rejected with errors. However, Applicants should not rely on the e-mail notification from Grants.gov to confirm that their SF-424 were validated. Applicants are strongly encouraged to use the tracking number provided in the first e-mail to closely monitor the status of their SF-424 by contacting the helpdesk at Grants.gov directly. If an Applicant has any questions related to the registration or submission process in Grants.gov or SAM.gov, it should contact these systems directly. The CDFI Fund does not manage Grants.gov or SAM.gov and is unable to respond to any questions related to these systems.

(2) What is the SF-424 field in the AMIS Application asking for, and when must I update this field?

This field requires your organization to link your completed SF-424 to your AMIS Application. Once the Applicant completes the SF-424 Mandatory Form in Grants.gov, AMIS retrieves and stores it locally as a document in the AMIS document library. The identifier on the SF-424 Forms is your Assigned Grant Tracking Number, issued by Grants.gov. You can find and view the SF-424 Forms in the look-up field next to the SF 424 field in the Application Information section. Searching for "GRANT*" will display the list of SF-424 associated forms.

Before submitting the AMIS Application, the Applicant must select and link the correct SF-424 document in this field from the AMIS local document library since it is possible that some organizations may have submitted multiple SF-424 forms. In the case of multiple SF-424 submissions, the Applicant should select the most recently submitted SF-424 for the BEA Program. Please ensure that you attach an SF-424 as part of your FY 2024 BEA Program Application. Failure to attach the appropriate SF-424 could result in the Application being deemed ineligible.

(3) Does the Award request amount we indicated in the SF-424 commit us to that amount in the BEA Program Application in AMIS?

No. The Award amount requested submitted in the SF-424 in Grants.gov is an estimate.

(4) Will the information that I provide in my BEA Program Application be available to the general public?

As a general practice, the CDFI Fund does not publish proprietary or confidential information submitted by Applicants. However, any information submitted by Applicants in Applications is

subject to the Freedom of Information Act (FOIA) (5 U.S.C. 552, *et seq.*) 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 Applicants may be exempt from disclosure pursuant to the FOIA. Applicants should consult their legal counsel for further guidance on this matter.

(5) Can a consultant sign an Application?

No, consultants working on behalf of the Applicant cannot sign the Application. However, the Applicant may include consultants as Application point(s) of contact in the Application.

Only an Authorized Representative, listed under the organization contacts in AMIS, may sign an Application. An Authorized Representative is an officer, or other individual, who has the authority to legally bind and make representations on behalf of the Applicant. An organization's consultant cannot be an Authorized Representative.

While the Authorized Representative must sign the Application in AMIS before the Application can be submitted, either the Authorized Representative or an Application point of contact can submit the Application in AMIS.

Please note that the Authorized Representative and/or Application point(s) of contact must be included as "Contacts" in the Applicant's AMIS account. The Authorized Representative must also be a "user" in AMIS. An Applicant that fails to properly register and update its AMIS account may miss important communications from the CDFI Fund or fail to submit an Application successfully.

(6) How do I locate my Organization's SF-424 Mandatory Form in AMIS?

An AMIS Administrator will retrieve the SF-424 Mandatory Form from Grants.gov after the Grants.gov SF-424 Mandatory Form deadline and make the document available for the Applicant to attach it to the FY 2024 BEA Program Application in AMIS. As soon as the SF-424 Mandatory Form is available in AMIS (typically within 24 hours of the SF-424 submission), the Applicant will be able to search for the SF-424 Mandatory Form within the BEA Program Application.

(7) Will I have an opportunity to revise or amend my BEA Program Application once it's been submitted in AMIS?

No. Applicants will not be able to revise or amend the BEA Program Application once it is submitted in AMIS. Prior to submitting the BEA Program Application electronically, Applicants must ensure all transactions (including supporting documentation) are entered correctly in AMIS and addresses and census tracts are validated prior to Application submission. Applicants will not be able to add, edit, upload documentation, or delete transactions after the BEA Application is submitted.

(8) What is the Title VI Compliance Worksheet and who is required to submit it?

All BEA Program Applicants will be required to submit the Title VI Compliance Worksheet once per calendar year to assist the CDFI Fund in determining whether Applicants are compliant with the Treasury regulations implementing Title VI of the Civil Rights Act (Title VI), set forth in 31 CFR Part 22. The Title VI Compliance Worksheet will then be linked within the BEA Application, similar to how Applicants currently look up and link their SF-424.

Title VI Compliance Worksheet resources such as FAQs and AMIS User Guide can be found on the [CDFI Fund's Non-Discrimination and Civil Rights Information](#) webpage.

(9) How do I locate my Organization's Title VI Compliance Worksheet in AMIS?

To complete the Title VI Compliance Worksheet:

- Log into your organization's AMIS account, click on the Organizations tab in the navigation bar, select your organization, and then click on the Related tab.
- Locate the Title VI Compliance Worksheets related list and click the "New" button to start the Title VI Compliance Worksheet; the Title VI Compliance Worksheet will open; complete all required information and click "Save."

Note: For assistance with completing the questions in the Title VI Compliance Worksheet, please refer to the U.S. Department of the Treasury's regulations implementing Title VI of the Civil Rights Act set forth in 31 CFR Part 22. Applicants should review such regulations carefully before completing this Title VI Compliance Worksheet. For further assistance on how to submit the Worksheet within AMIS, regarding Title VI please refer to the [Title VI AMIS Training Manual](#).

(10) If I recently applied for another CDFI Fund program, do I need to submit a new Title VI Compliance Worksheet for BEA Program? Or can I use my existing one?

It depends on what year the Title VI Compliance Worksheet was submitted. Applicants to CDFI Fund programs are required to complete one Title VI Compliance Worksheet for **each calendar year** that they submit funding Applications. Further, the Title VI Compliance Worksheet must match the **calendar year** of the **date the Applicant submits an Application**. Since **ALL** FY 2024 BEA Applicants will submit their Applications in **calendar year 2024**, they must link the submitted Title VI Compliance Worksheet for **calendar year 2024** to their BEA Application. If your organization has already submitted a calendar year 2024 Title VI worksheet for another CDFI Fund Program, you will attach that same worksheet to your BEA Application.

General BEA Program Questions

(11) What types of organizations are eligible to apply for a BEA Program Award?

Eligible Applicants for the BEA Program must be Insured Depository Institutions, as defined in the Interim Rule (12 C.F.R. § 1806). An Insured Depository Institution is any bank or thrift, the deposits of which are insured by the Federal Deposit Insurance Corporation

For the FY 2024 funding round, an Applicant must have been FDIC-insured as of the first day of the Baseline Period, January 1, 2022, and maintain its FDIC-insured status at the time of Application submission.

AMIS account users will not be able to launch a BEA AMIS Application if the organization type is anything other than “Bank/Thrift.”

(12) Can Bank Holding Companies apply for A BEA Program Award?

No. Depository Institution Holding Companies are not able to apply for a BEA Program Award on behalf of their subsidiary banking institutions. AMIS account users will not be able to launch a BEA AMIS Application if the organization type is anything other than “Bank/Thrift.”

(13) What is the difference between “Qualified Activities” and “Eligible Activities”?

“Qualified Activities” are performed activities which qualify an Applicant for an Award. “Eligible Activities” are activities that Recipients use to expend their Awards. See Interim Rule 12 C.F.R. § 1806.300.

(14) How is the final Award Amount Determined?

The CDFI Fund will determine the eligibility of each transaction an Applicant has submitted for consideration in its FY 2024 BEA Program Application. Based upon this review, the CDFI Fund will calculate the actual Award amount for which the Applicant is eligible. The CDFI Fund will determine actual Award amounts based upon the availability of funds, increase in Qualified Activities from the Baseline Period to the Assessment Period, the CDFI Certification status of the Applicant, and the priority ranking of an Applicant. In calculating the increase in Qualified Activities, the CDFI Fund will determine the eligibility of each transaction that an Applicant has submitted for consideration for a BEA Program Award.

If an Applicant receives an Award for Qualified Activities in more than one activity type, the CDFI Fund will combine the Award amounts into a single BEA Program Award. Award amounts may also be adjusted based on funding availability and Persistent Poverty County (PPC) requirements if applicable.

(15) How do I complete Table 1- Baseline Period Activities?

Applicants must report the total Baseline Period for the activity type within the category or sub-category for which a BEA Program Award is being sought. Applicants are not required to report Baseline Activities in categories where the Applicant did not report an increase and/or is not seeking a BEA Program Award for the category or sub-category.

(16) What business types are ineligible BEA Qualified Activities?

Per the FY 2024 BEA Program NOFA, the CDFI Fund will not consider financial assistance provided by an Applicant for the purposes of financing adult entertainment providers, golf courses, racetracks, gambling facilities, country clubs, facilities offering massage services, hot tub facilities,

suntan facilities, or stores where the principal business is the sale of alcoholic beverages for consumption off premises as BEA Qualified Activities.

(17) Are Letters of Credit considered Qualified Activities?

Instruments issued by an Applicant guaranteeing payment of a borrower's debt obligation (direct-pay letters of credit, stand-by letters of credit, revolving letters of credit, etc.) are not considered Qualified Activities and should not be reported.

(18) How should I determine whether my organization's transactions are located in Distressed Communities?

Applicants applying for a BEA Program Award for performing Distressed Community Financing Activities or Service Activities must verify that the physical addresses of such activities during both, the Baseline Period and Assessment Period, are in Distressed Communities when completing their Application.

Applicants may use CIMS or the tabular [BEA Program Eligibility Data](#) located on the CDFI Fund's public website to determine the eligibility of a census tract and determine if they are located in a BEA Qualified Distressed Community.

Applicants should also be aware that the BEA Program Application in AMIS will validate the census tract qualification status and geocoding for transactions in the Distressed Community Financing Activities and Service Activities categories. The determination of whether a census tract qualifies for the BEA Program will occur immediately. To ensure that these transactions will be considered during the Application review process, Applicants are encouraged to perform geocoding in CIMS to ensure physical addresses are associated with the correct census tract.

(19) How do I demonstrate a transaction occurred in a Distressed Community if AMIS does not recognize or geocode the exact address? I receive an error message when trying to upload transactions to Table 2.

When AMIS does not recognize the address listed in the loan documents, Applicants should attempt to reformat the address in the CSV file.

For example, a borrower's address listed on the loan agreement is "1234 Jones Highway 1, Anytown, AL 56789." During the geocoding process performed in CIMS, CIMS indicates the address is "1234 US-1, Anytown, AL 56789."

Due to this difference, the Applicant should perform the following steps when entering the address into the Application:

- Use the geocoded address from CIMS, rather than from the loan documents: "1234 US-1, Anytown, AL 56789." The CDFI Fund will also accept results from the [United State Census Geocoder](#) as a source for accessing the "Matched Address" which may be used to assist in geocoding errors. Applicants should ensure they are using the 2020 Census Data when utilizing the Census Geocoder.

- After the transaction is uploaded, ensure the census tract reads as “Qualified” in Table 2 of the Application.
- Supporting documentation for the transaction must include a brief note to indicate: (1) the physical address per supporting documentation was not recognized in AMIS; and (2) a revised address was required to generate the accurate census tract where the property is located.

NOTE: The CDFI Fund will review supporting documentation to ensure the physical address aligns with what was entered in the Application.

If the steps above do not resolve the issue, Applicants should submit a Service Request via AMIS. The service request must include: (1) a completed CSV file of only transactions unable to be submitted, and (2) supporting documentation to verify the transaction’s accurate location (e.g., map screenshot, CIMS screenshot, census tract verification, etc.). The CDFI Fund will upload the transaction to the AMIS Application. Once it has been uploaded, Applicants will attach the required documentation per the Application Instructions (e.g., promissory note, disbursement documents).

Applicants must submit any Service Requests related to transaction upload support by June 21, 2024 at 5:00 pm ET in order to ensure the CDFI Fund has time to process the Service Request prior to the Application submission deadline. The CDFI Fund cannot guarantee that Service Requests submitted after June 21, 2024 at 5:00 pm ET will be processed prior to the application deadline. If a Service Request has not been submitted prior to June 21, 2024 at 5:00 pm ET, Applicants are advised to remove the transactions generating errors from the CSV file to ensure successful data upload and timely Application submission.

(20) A transaction in Table 2 is showing as “Not Qualified” due to AMIS selecting an incorrect census tract. The address is located in a BEA Qualified census tract. How can I update my Application to reflect the correct information?

In instances where the Application generates an incorrect census tract, please submit a service request with the following information:

- Transaction number in Application (TN-XXX...)
- Transaction address
- Census tract number
- Supporting documentation to verify the transaction’s accurate location (e.g., map screenshot, CIMS screenshot, census tract verification, etc).

Prior to submitting a Service Request, Applicants may also attempt to reformat the address to ensure the address maps to the correct census tract. Use the geocoded address from CIMS, rather than from the loan documents: “1234 US-1, Anytown, AL 56789.” The CDFI Fund will also accept results from the [United State Census Geocoder](#) as a source for accessing the “Matched

Address” which may be used to assist in geocoding errors. Applicants should ensure they are using the 2020 Census Data when utilizing the Census Geocoder.

Supporting documentation for the transaction must include a brief note to indicate: (1) the physical address per supporting documentation was not recognized in AMIS; and (2) a revised address was required to generate the accurate census tract where the property is located.

NOTE: Partially Qualified census tracts must show that Contig Qualify = “Yes” on the CIMS detail page.

If this does not resolve the issue, Applicants must submit any Service Requests related to transaction upload support by June 21, 2024, at 5:00 pm ET in order to ensure the CDFI Fund has time to process the Service Request prior to the Application submission deadline. The CDFI Fund cannot guarantee that Service Requests submitted after June 21, 2024, at 5:00 pm ET will be processed prior to the Application deadline. The CDFI Fund will utilize the information and complete its own verification within 24-48 hours and Applicants will see the BEA Qualification status updated if applicable.

(21) Are transactions funded through other CDFI Fund programs (i.e. CDFI ERP, CDFI-FA) eligible to be considered Qualified Activities?

No. A BEA Applicant may not submit as Qualified Activities any transactions funded with award proceeds from another CDFI Fund program or Federal award.

(22) My organization submitted a CDFI Certification Application, will I be eligible to be considered a CDFI Applicant for the FY 2024 BEA Program Application?

Applicants are not required to be Certified CDFIs to be eligible for the BEA Program. The CDFI Certification status is used to determine the Applicant’s award amount. To be considered “Certified” for the purposes of the FY 2024 BEA Program Application, Applicants must either:

- 1) be certified as a CDFI as of December 31, 2023 (end of the Assessment Period) and remain certified at the time BEA Program Awards are announced; or
- 2) have submitted a CDFI Certification Application by May 28, 2024, and receive and maintain its status as a Certified CDFI by the time BEA Program Awards are announced.

(23) Are Participation Loans considered eligible Qualified Activities? What are the documentation requirements?

A participation loan is treated the same as other loans under the BEA Program. As such, it may qualify as either a CDFI Support Activity or a Distressed Community Financing Activity.

A participation loan is a loan that is made jointly by two or more lenders to a borrower. Some participation loans involve a promissory note that references all the lenders to the transaction with each independently disbursing loan proceeds to the borrower. However, the most common form of participation loan involves one of the lenders serving as a “lead lender” or “agent” for the group. In this case, the borrower signs the note solely to the order of the lead lender. The lead lender then disburses all loan proceeds and the borrower makes payments of principal and/or interest solely to the lead lender. The other “participating lenders” usually sign a “participation agreement” that outlines their agreement to fund a portion of the loan issued by the lead lender, their respective rights to loan proceeds, and the obligations of all parties to the transaction. The lead lender and all of the participating lenders generally sign this agreement. It is important to note that the disbursement of funds to the lead lender or agent to fund loans to third parties by one or more participating lenders (i.e., a loan pool) is not considered a Qualified Activity.

In order for a participation loan to be considered a CDFI Support Activity, the borrower must be a CDFI that is Integrally Involved in a BEA Qualified Distressed Community and the monies drawn must be used to support the CDFI’s activities. If the CDFI Partner is participating in, or otherwise facilitating, the loan transaction -- but is not the actual borrower -- the transaction will not be considered a CDFI Support Activity. In order for a participation loan to be considered a Distressed Community Financing Activity, the borrower or activity financed must be located in a BEA Qualified Distressed Community.

As with other loans, in order for a participation loan to be a Qualified Activity under the BEA Program, the loan must be closed and an initial disbursement must be made during the applicable Assessment Period. Thus, all parties to the transaction must sign and execute the loan documents within the Assessment Period specified in the BEA Program NOFA. If the transaction involves a participation agreement between two or more lenders, the agreement may be signed prior to or during the Assessment Period provided that the note or loan agreement is signed within the Assessment Period. A BEA Program Applicant will not receive a BEA Program Award for a participation loan unless it is specifically named as a lender or party to the original transaction on the note or the participation agreement. An Applicant will only receive credit for their share of the participation loan. An Applicant will not receive credit for purchasing a participation in a loan after the loan’s origination.

Participation agreements between lenders may be in effect for multiple years, involve multiple loan agreements or notes, or involve multiyear disbursements of a single loan. While a participation agreement among lenders may be executed prior to an applicable Assessment Period, a BEA Program Applicant can only receive an Award for a loan that funded a Qualified Activity closed during the Assessment Period. Thus, a transaction involving the disbursement of a loan closed prior to the start of the applicable Baseline Period or after the end of the applicable Assessment Period is not considered a Qualified Activity.

In some cases, a group of lenders may choose to renew or extend the term of a participation loan that is expected to expire during an applicable Assessment Period. As is the case with all renewed loans under the BEA Program, if a participation loan matures and is then renewed during the

Assessment Period, the Applicant will be ineligible to receive the value of its share of the principal amount of the renewed participation loan. However, in the case of a participation loan that is not set to expire during the Assessment Period but is refinanced, the BEA Program Applicant will be eligible to receive only the value of its share of any increase in the principal amount of the refinanced loan.

- (24) **My organization submitted a FY 2023 BEA Program Application. When preparing our FY 2024 BEA Program Application, should the Baseline Period transactions in our FY 2024 BEA Program Application be the same as the Assessment Period transactions reported in our organization's FY 2023 application for the overlapping period of 1/1/2022-12/31/2022?**

Applicants that previously applied to the FY 2023 BEA Program Application round should recalculate their Baseline Period Amounts for the FY 2024 Application, as the CDFI Fund has issued new guidance which may impact the FY 2024 Baseline Period amount. Applicants should review all of the FY 2024 Application materials to ensure they take any new guidance into consideration when preparing their Application.

For example, FY 2024 Applicants may only use the 2016-2020 ACS eligibility data to determine if Qualified Activities occurred in BEA Distressed Communities. Applicants that reported transactions using the 2011-2015 ACS eligibility data in the previous FY 2023 BEA Program Application's Assessment Period should exclude the legacy 2011-2015 ACS eligibility data from the FY 2024 Baseline Period and recalculate the Baseline Period using the updated 2016-2020 ACS data.

- (25) **How do I report a loan's total amount disbursed if the loan's transaction history includes fees and repayments?**

For disbursed loans that include repayments and/or fees, the Applicant should report the loan's highest principal balance at any point in time of the eligible disbursement history that falls within the approved loan amount. The "Amount Disbursed to Date" noted in the Table 2: Transaction List cannot exceed the "Loan Value" field.

- (26) **How should I report disbursements that occurred after the close of the Assessment Period?**

Applicants should report all disbursements that were made up to the date of the NOFA publication date in the CSV file "Amount Disbursed to Date" field provided that the loan was closed during the Assessment Period. This will include disbursements made during the Assessment Period, as well as funds disbursed after the end of the Assessment Period but prior to the NOFA publication date.

Questions on CDFI Related Activities

(27) What are the characteristics of a CDFI Related Equity-Like Loan?

For purposes of the FY 2024 BEA Program NOFA, Equity-Like Loans must have been provided by the Applicant or Subsidiary to a CDFI Partner and meet the following criteria:

1. At the end of the initial term, the loan must have a definite rolling maturity date that is automatically extended on an annual basis if the CDFI borrower continues to be financially sound and carrying out a community development mission – unless the borrower and the bank mutually agree to terminate the agreement;
2. Periodic payments of interest and/or principal may only be made out of the Certified CDFI borrower's available cash flow after satisfying all other obligations;
3. Failure to pay principal or interest (except at maturity) will not automatically result in a default under the loan agreement; and
4. The loan must be subordinated to all other debt except for other Equity-Like Loans.

Notwithstanding the foregoing, the CDFI Fund reserves the right to determine, on a case-by-case basis, whether a loan meets the aforementioned Equity-Like Loan characteristics.

(28) Are In-kind Contributions to CDFIs an eligible transaction type?

In-kind contributions to CDFIs (such as donation of equipment or office space) are not considered Qualified Activities and should not be reported.

(29) How do I know if an organization is a CDFI Partner?

An eligible CDFI Partner that receives CDFI Support Activities from an Applicant must be Integrally Involved in a Distressed Community and have been certified as a CDFI as of the date that the BEA Applicant made its investment or provided support.

(30) How do I demonstrate that my CDFI Partner is Integrally Involved in a Distressed Community?

Applicants must provide evidence that each CDFI Partner that is the recipient of CDFI Support Activities is Integrally Involved in a Distressed Community. CDFI Partners that receive Equity Investments, Equity-Like Loans or Grants are not required to demonstrate Integral Involvement. Applicants must provide evidence that each CDFI Partner that is the recipient of CDFI Support Activities is Integrally Involved in a Distressed Community by submitting the "Integral Involvement Form for CDFI Support Activity." Proof of Integral Involvement can be obtained from the CDFI Partner at the time the transaction is closed (or after) and will be submitted as supporting documentation by the Applicant. There are four (4) scenarios outlined on the "Integral Involvement Form for CDFI Support Activity" for CDFI Partners to determine Integral Involvement. Please see **Appendix 1** of this document for examples of determining Integral Involvement for each scenario.

(31) How should I demonstrate CDFI Deposits are Materially Below Market Rates?

Insured Certificates of Deposit (CD) placed by an Applicant in a CDFI that is a bank, thrift, or credit union must earn a rate of interest that is considered by the CDFI Fund to be “Materially Below Market.” A “Materially Below Market” interest rate is defined as an annual percentage rate that does not exceed the yields on Treasury securities at constant maturity as interpolated by Treasury from the daily yield curve. This information is available on the [Treasury’s Interest Rate Statistics](#) webpage.

For example, for a three-year CD, Applicants should use the three-year rate U.S. Government securities, Treasury Yield Curve Rate posted for that business day. The Treasury updates the website daily at approximately 5:30 p.m. ET. CDs placed prior to that time may use the rate posted for the previous business day. The annual percentage rate on a CD should be compounded daily, quarterly, semi-annually, or annually.

If a variable rate is used, the Applicant must describe its methodology for determining a three-year life rate that is materially below the market interest rate. The CDFI Fund reserves the right to follow up with the Applicant regarding rates that **were used throughout** the three-year period.

(32) What is the term requirement for CDFI Deposits?

CDs placed in a CDFI Partner that is a bank, thrift, or credit union must also be committed for at least three years to be considered a Qualified Activity. The maturity date of a three-year CD should fall on the date of the three-year anniversary of when the CD was placed. For example, if a three-year CD was placed on 12/31/2023, then the maturity date would be 12/31/2026.

(33) Is a CD that places deposits in a deposit network or service an eligible transaction?

A CD placed by an Applicant directly with a CDFI Partner that participates in a deposit network or service may be treated as eligible under the FY 2024 BEA Program NOFA, if it otherwise meets the criteria for deposits in the FY 2024 BEA Program NOFA and the CDFI Partner retains the full amount of the initial CD through a deposit network exchange transaction. An Applicant will not receive a BEA Program Award for a CD network or service unless the CDFI Partner is specifically named as a network member to the original transaction in the deposit placement agreement. A BEA Program Applicant will only receive credit for its respective share of the CD network or service provided to the CDFI Partner.

Questions on Distressed Communities Financing Activities

(34) What information is needed to demonstrate affordability for Affordable Housing Development transactions?

When submitting Affordable Housing Development Loan and Project Investment transactions, Applicants must provide certification that such borrowers are Low-and Moderate-Income individuals and provide a brief analytical narrative describing how the determination was made.

At least 60% of the units in such property must be affordable to Low- and Moderate-Income individuals. Applicants should note that eligible Affordable Housing Development Loans and related Project Investments do not include housing for students or school dormitories. For purposes of this Application, “affordable” is defined as a unit that is or will be sold or rented to a Low- and Moderate-Income individual.

When submitting Affordable Housing Development Loan and Project Investment transactions, Applicants must: (1) provide documentation that at least 60% of the units in the property financed are or will be sold or rented to Eligible Residents¹ who meet Low-and-Moderate-income requirements², or (2) if such documentation is not available, provide a brief analytical narrative describing how the determination was made that at least 60% of the units in the property financed have or will be sold or rented to Eligible Residents who meet Low- and Moderate-Income individuals requirements.

(35) What address documentation is required for real estate transactions?

For real estate related transactions such as Affordable Housing Loans (AHL), Affordable Housing Development and Related Project Investments (AHD), Home Improvement Loans (HIL), and Commercial Real Estate (CRE), the closing document must indicate the address of the real estate that was financed. If the closing document does not indicate the address of the real estate that was financed, the Applicant must submit additional documentation that indicates the address of the real estate that was financed.

(36) My organization provided a real estate loan that financed real estate in more than one location. What documentation do I need to provide?

If a blanket loan was provided to finance real estate at more than one location, the Applicant must provide documentation that indicates the addresses of all real estate financed. The Applicant should also include: (1) a note indicating which addresses qualify as a BEA Distressed Community, and (2) CIMS maps for the additional addresses which qualify. Transactions missing this information will not be considered.

The Applicant should report the Loan Value for the transaction based on the aggregated appraised value of the loans covering those addresses. For example: If the loan was used to finance 10 addresses and five of the addresses are in BEA qualified census tracts, the Total Dollar Value entered in Table 2: Transaction List should reflect the combined appraised value for the five loans in BEA qualified census tracts.

¹ The Eligible Resident test is determined by using the eligibility data to determine whether the occupants reside in a qualified tract.

² The BEA Program Tabular Data on the CDFI Fund’s website provides information on the median family income for applicable census tracts. Applicants have the option to use the tabular data to determine whether the occupants: (1) reside in a qualified census tract; and (2) meet Low- and Moderate income requirements. Per the FY 2024 Application Instructions document, Low- and Moderate Income means borrower’s income does not exceed 80% of the area median income, according to the U.S. Census Bureau data. Applicants should provide documentation supporting the determination that at least 60% of the units in the property financed are or will be sold or rented to Eligible Residents who meet Low –and Moderate-Income requirements. Examples could be documentation regarding the borrower’s participation in state, local, or Federal government programs (i.e. HUD’s LIHTC or Housing Choice Voucher/Section 8), and/or internal documentation between the bank and borrower indicating this determination. The narrative can be included with other supporting documentation or in the Notes field of the Transaction Detail CSV or as addition to supporting documentation in AMIS.

(37) What documentation is required for Distressed Community Financing Activities less than \$250,000?

While Applicants are not required to submit supporting documentation for Distressed Community Financing Activities of less than \$250,000, Applicants are expected to maintain records for any transaction submitted as part of the FY 2024 BEA Program Application, including supporting documentation for Distressed Community Financing Activity transactions of less than \$250,000. The CDFI Fund reserves the right to contact an Applicant at any time to request supporting documentation for Distressed Community Financing Activities transactions of less than \$250,000.

(38) Are leverage loans used in New Markets Tax Credit transactions considered a BEA Qualified Activity?

Yes. Leverage loans used in the CDFI Fund's New Markets Tax Credit (NMTC) Program transactions can be considered a Distressed Community Financing Activity if the borrower is located in a BEA Qualified Distressed Community and the transaction meets the BEA Program Interim Rule and FY 2024 BEA Program NOFA requirements. See **"Reporting Qualified Activities and Supporting Documentation"** section of the FY 2024 BEA Program Application Instructions for supporting documentation requirements for NMTC transactions.

(39) What is considered an "Small Dollar Consumer Loan" in the Consumer Loans sub-category?

Per the FY 2024 BEA Program NOFA, eligible Small Dollar Consumer Loans are responsible and affordable loans that serve as available alternatives to the marketplace for individuals who are Eligible Residents who meet Low- and Moderate-Income requirements with a total principal value of no less than \$500 and no greater than \$5,000 and have a term of ninety (90) days or more. A responsible Small Dollar Loan generally considers the borrower's ability to repay and may also reflect repayment terms, pricing, and safeguards that minimize adverse customer outcomes, including cycles of debt due to rollovers or reborrowing.

(40) What does the BEA Program consider a "small business" for Small Business Loans and Project Investments?

See the QUALIFIED ACTIVITY DOCUMENTATION – DISTRESSED COMMUNITY FINANCING ACTIVITIES Section of the FY 2024 BEA Program Application Instructions document which summarizes the criteria used to determine a small business loan. It must be a loan:

- Used for commercial or industrial purposes (other than an Affordable Housing Loan, Affordable Housing Development Loan, Commercial Real Estate Loan, or Home Improvement Loan); and
- To a business or farm that meets the size eligibility standards of the Small Business Administration's Development Company of Small Business Investment Company programs (13 C.F.R. § 121.301).

(41) I have a commercial real estate transaction that includes other uses such as housing (market-rate or affordable). What DCFA sub-category does it belong in?

Loans originated for the construction or acquisition of a commercial property should be treated as a Commercial Real Estate Loan when reporting the transaction type, regardless of whether or not it includes more than one use. However, it is important to note, Commercial Real Estate Loan sub-category may not include loans that qualify as Affordable Housing Development Loans (i.e. at least 60% of the units are affordable) or Affordable Housing Loans, as defined in the BEA Interim Rule.

(42) What information is needed for Commercial Real Estate or Small Business Loans in the “Business Activity Field”?

For Commercial Real Estate and Small Business Loan transactions, the business type being financed must be identified in the “Business Activity” field in the CSV file. Examples of business types include: hotel, grocery store, retail real estate development (i.e. development where not all tenants are identified).

Per the NOFA, Applicants should be aware that the following business types are considered ineligible business activities: adult entertainment providers, golf courses, race tracks, gambling facilities, country clubs, facilities offering massage services, hot tub facilities, suntan facilities, or stores where the principal business is the sale of alcoholic beverages for consumption off premises.

Questions on Loan Renewals and Refinancings

(43) Are Loan Renewals considered a Qualified Activity?

Loans renewed during the Baseline Period or the Assessment Period are not considered Qualified Activities and should not be reported. However, Certificates of Deposit to CDFI Partners, renewed after the previous three-year term has expired during the applicable Assessment Period, are a Qualified Activity if they meet the requirements specified in the FY 2024 BEA Program NOFA. Applicants will need to provide documentation indicating the first issuance date and renewal date of the Certificate of Deposit.

(44) Are refinanced loans considered a Qualified Activity?

A loan is considered refinanced when a borrower with an existing loan applies for a new loan and a new credit decision is made. For BEA Program purposes, refinancing of loans fall into two broad categories: (1) refinancing an existing loan in a BEA Applicant’s loan portfolio; and (2) refinancing a loan from an institution that is not affiliated with the Applicant.

Refinancing of loans (including fixed rate and adjustable-rate mortgages) by the Applicant may be valued only at the amount of increase to the principal amount of the loan (i.e., the new credit available).

To demonstrate the increase, Applicants are instructed to submit a copy of the original loan documents for the loan that is being refinanced in addition to loan documents for the new loan. If the original loan documents for the refinanced loan are not available, Applicants may submit

other internal documentation that demonstrates the increase and that proceeds were used to pay off an existing loan with the Applicant. Transactions submitted without supporting documentation that clearly demonstrates the increase and that the proceeds were used to pay off an existing loan with the Applicant will be disqualified.

(45) Is a loan refinanced within an Applicant's portfolio a Qualified Activity?

Refinancing of loans (including fixed rate and adjustable-rate mortgages) by the Applicant may be valued only at the amount of increase to the principal amount of the loan (i.e., the new credit available). For example, if an Applicant originally financed a loan for \$100,000 and the borrower subsequently wanted to refinance the loan and increase the amount borrowed to \$125,000, the Applicant can only claim the increase in the principal amount of \$25,000.

In order to meet the Qualified Activity requirement specified in the FY 2024 BEA Program NOFA, supporting documentation must be provided to demonstrate the increase in principal amount. Transactions that do not clearly demonstrate the increase in principal amount may be disqualified entirely.

(46) Is a loan refinanced from an Unaffiliated Institution considered a Qualified Activity?

Existing loans from an unaffiliated institution that are refinanced by a BEA Program Applicant are considered new activities for the BEA Program Applicant and can be submitted as such for the full principal amount of the loan. For example, if an Applicant refinanced and paid off a loan to a small business borrower that was with an unaffiliated institution with a loan balance of \$100,000, the loan would be considered a new loan for the Applicant, and the Applicant would be able to claim the full principal balance of \$100,000 as an increase amount. The key factor here is that the loan was new to the Applicant. In order to meet the Qualified Activity requirement specified in the FY 2024 BEA Program NOFA, supporting documentation must be provided to demonstrate that the new principal amount was used to pay off an existing loan with an unaffiliated institution. Applicants should rely on their own internal documentation to demonstrate that the proceeds were used to pay off an existing loan. Additional documentation, such as wire transfer instructions, may be submitted if the use of proceeds is not clear from the closing or disbursement document.

Questions on Service Activities

(47) How do I report Individual Development Accounts (IDAs) as a Qualified Activity?

For both the Baseline Period and the Assessment Period, an Applicant may derive the total percentage of Low-and Moderate-Income individuals who are IDA account holders by: (1) providing a certification that such customers are Low-and Moderate-Income individuals and providing a brief analytical narrative with information describing how the Applicant determined that such customers were Low-and Moderate-Income individuals; or (2) providing a certification and brief analytical narrative that IDAs established for Project Participants by financial institutions, as published in Program Announcement OCS-2000-04 ("IDA Program

Announcement”) in the Federal Register (64 FR 69824) in Part II (G)(3) of the IDA Program Announcement, benefit Low- and Moderate-Income individuals based on the requirements of the IDA Program.

(48) How do I report and determine the Total Dollar Value for Technical Assistance Qualified Activities?

Technical Assistance provided by an Applicant to a Certified CDFI must be reported based on the administrative cost of providing the services. For staff time, report the number of hours contributed to the service times the hourly rate of the staff member. For other administrative costs (such as printing costs for informational materials), report the actual cost. An Applicant should submit an itemized list of costs that it is seeking to be considered as a Qualified Activity. In reporting the cost of Technical Assistance activities, the Applicant should certify that the reported items are an accurate reflection of the actual costs incurred in delivering the service.

(49) How should Applicants report financial literacy training or technical assistance provided to ETA or IDA holders?

An Applicant should report financial literacy training or other types of technical assistance provided to Electronic Transfer Account (ETA) or Individual Development Account (IDA) holders as Community Services in the Services Activity Category. An Applicant should also report funds provided to match IDAs, either directly or through a non-profit entity, as Community Services in the Services Activities Category.

(50) What is the definition of Community Services?

Per the FY 2024 BEA Program NOFA, Community Services are Service Activities and refer to the following forms of assistance provided by officers, employees, or agents of the Applicant:

1. Provision of Technical Assistance and financial education to Eligible Residents regarding managing their personal finances;
2. Provision of Technical Assistance and consulting services to newly formed small businesses and nonprofit organizations located in a Distressed Community;
3. Provision of Technical Assistance and financial education to, or servicing the loans of, homeowners who are Eligible Residents and meet Low- and Moderate-Income requirements; and
4. Other services provided to Eligible Residents who meet Low- and Moderate-Income requirements or enterprises that are Integrally Involved in a Distressed Community, as deemed appropriate by the CDFI Fund.

(51) How is the Total Dollar Value for Deposit Liabilities determined?

In order to determine the increase in Deposit Liabilities from the Baseline Period to the Assessment Period, the Applicant should calculate the balance of eligible Deposit Liabilities at the end of the Assessment Period and place that number in Table 2: Transaction List. The balance of eligible Deposit Liabilities at the end of the Baseline Period should be placed in Total Dollar Value in Table 1: Baseline Period Activities. Applicants must provide a narrative via attachment to the transaction with the methodology used to determine that: (1) account holders are Residents of the Distressed Community; and (2) Deposit Liabilities were accepted at a location within the Distressed Community.

For this Qualified Activity, Applicants are not required to report each individual depositor. See “**Qualified Activity Documentation – Service Activities**” of the FY 2024 BEA Program Application “Reporting and Documenting – Deposit Liabilities,” for more information on how to report this type of activity.

Questions on Mergers and Acquisitions

(52) My organization was a part of a merger that occurred prior to Application submission. How should I report my Baseline and Assessment periods?

The BEA Program Application should only be submitted by the surviving entity of a merger or an acquisition that occurred prior to the FY 2024 BEA Program Application funding round opening, regardless of whether the activities were performed prior to the merger or acquisition, or whether the activities were performed by the entity that is no longer in operation.

The surviving entity’s information (including EIN, UEI, Authorized Representative and Point of Contact) should also be reflected in SAM.gov, the SF-424 Mandatory, and AMIS.

The acquired bank’s activities must be included in the Baseline and Assessment Periods of the surviving entity.

(53) My organization completed a merger that occurred after Application Submission, what steps should I take to inform the CDFI Fund?

If a merger or an acquisition occurred after a BEA Program Application is submitted, but prior to the execution of the BEA Program Award Agreement, the CDFI Fund will determine whether the surviving entity may assume the role of a BEA Applicant. The CDFI certification status will be based on the surviving entity’s CDFI certification status.

If the surviving entity and the acquired entity are both BEA Program Applicants, the activities of both Applicants will be combined to make one Award to the surviving entity, which shall not exceed the maximum Award Amount (cap) determined for the round.

Per the FY 2024 BEA Program NOFA, the surviving entity must also be a FDIC-insured depository institution to be considered eligible for a BEA Program Award.

- The surviving entity assuming the role of the FY 2024 BEA Program Applicant will not be able to make modifications to the Application. As noted in the FY 2024 BEA Program NOFA, once an Application is submitted, the Applicant will not be allowed to change any element of the Application. The estimated Award Amount will be recalculated based on the surviving entity’s CDFI certification status. The information used to determine the priority factor for activities within the Distressed Community Financing Activities category and Service Activities category of Qualified Activities will be based on the surviving entity’s total asset size, which may result in a reduction of the estimated Award.
- A Certification of Material Events Form is required to be completed by the Applicant and submitted via an AMIS Service Request.

- The surviving entity (i.e. the BEA Applicant) should also ensure that its organization's information in SAM.gov is updated to reflect the surviving entity's information and matches their AMIS organization profile.

Questions on Personally Identifiable Information (PII)?

(54) What is Personally Identifiable Information (PII)?

Personally Identifiable Information (PII) is information, which if lost, compromised, or disclosed without authorization, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual. Although Applicants are required to enter addresses of individual borrowers/residents of Distressed Communities in AMIS, Applicants should not include the following PII for the individuals who received the financial products or Services (e.g., individual resident, business owner, or other representative) in AMIS, or in the supporting documentation. PII refers to information that can be used to distinguish or trace an individual's identity, either alone (SSN) or when combined with other information (name of the individual, address, date of birth, driver's license or state identification number, passport number, and Alien Registration Number, etc.) that is linked or linkable to the individual.

- Transaction addresses indicating the physical location of the activity financed, investment, or service provided should NOT be redacted.
- Applicants should NOT redact signatures from legal documents (e.g., loan agreements, promissory notes, etc.).

Note: Applicants must exclude PII when entering data in AMIS and redact PII from all documents required to be submitted as supporting documentation, EXCEPT for the addresses of the borrowers/residents, business owners, or other representatives. Legal documentation representing a COMMERCIAL loan that includes a combination of the individual's name, personal address, and other PII should be redacted.

Example 1: An Applicant submits a transaction for a Small Business Loan (SBL), which is an activity type in the Commercial Loans and Investments subcategory of Distressed Community Financing Activities. The supporting documentation for the transaction included an executed loan agreement, executed promissory note, and screenshots of the account/ loan payment history. The loan agreement includes the name of the business: 'Jones Moving and Trucking Company' as the borrower, and also includes the address of the business. The loan agreement is signed by the owner 'Joe Jones' and his name is printed below the signature line.

This is acceptable and is **not** considered PII. Although the name of an individual (Joe Jones) is included, the Applicant is not required to redact it since there is no other information for this individual included in the documentation or in AMIS to be considered PII (e.g., date of birth, individual's address, etc.).

Example 2: The Applicant noted in Example 1 also included an additional address labeled as "Sole Business Owner" in the account/ loan payment history screenshots.

This is **not** acceptable since PII was provided. In this scenario, the business owner's personal name is printed on the loan agreement **and** the business owner's personal address is included in the screenshot. The Applicant should redact the sole business owner's personal address and/ or printed name.

Example 3: The Applicant noted in Example 1 also included the transaction's payment history which reflects an SSN in a field intended for an EIN/TIN.

This is **not** acceptable since PII was provided. In this scenario, a SSN is provided, which is linkable to an individual. The Applicant should redact the SSN.

(55) Should e-signatures related to BEA Application materials be included within the submitted documents?

Applicants should not redact signatures from legal documents (e.g., loan agreements, promissory notes, etc). Signatures demonstrate legal execution of documents and should be included. Additionally, if supporting evidence is needed to verify the legitimacy of a signature, please include this information in the documentation materials.

(56) How can I meet the supporting documentation requirements if the documents that are required to be submitted contain PII?

If the supporting documentation for the activity contains PII, Applicants should redact this information and ensure that none of these data points are visible before submission.

If the supporting documentation represents a commercial loan that includes both the physical location of the investment property and the personal address of the borrower, then the borrower's personal address and other PII information should be redacted. The address indicating the physical location of the financed activity, investment, or service provided, should not be redacted. Applicants should not redact signatures from legal documents (e.g., loan agreements, promissory notes, etc.). If the CDFI Fund discovers PII during the review of a transaction, the supporting documentation will be deleted from the Application record and the transaction will be deemed ineligible.

APPENDIX: EXAMPLES OF INTEGRAL INVOLVEMENT

The “Integral Involvement Form for CDFI Support Activity” must be completed by the CDFI Partner. To assist CDFI Partners in determining whether they are Integrally Involved in one or more BEA Distressed Communities, the following examples (which represent each of the four ways a CDFI Partner can be considered to be Integrally Involved) have been provided.

Scenario	Description & Example
Scenario I.	<p>Provided at least 10 percent of the number of its financial transactions or dollars transacted (e.g., loans or Equity Investments) to business or in a Distressed Community or Eligible Residents during the assessment period or;</p> <p><u>Example:</u> A CDFI Partner provided financial transactions of \$50 million, \$45 million, and \$40 million in calendar years 2023, 2022, and 2021, respectively, totaling \$135 million over the three calendar years preceding the date of the FY 2024 BEA Program NOFA. Of these financial transactions, \$14 million, \$10 million, and \$6 million were provided in one or more Distressed Communities during the same respective years, totaling \$30 million.</p> <p><u>Calculation:</u> \$30 million (financial transactions provided in Distressed Communities) / \$135 million (total financial transactions) = 22% (financial transactions provided in one or more Distressed Communities).</p> <p><u>Determination:</u> 22% is greater than the 10% required under this scenario. Therefore, the CDFI Partner has demonstrated that it has met the requirement under this scenario.</p> <p><i>NOTE: This calculation could also be based on counting the number (volume) of financial transactions which occurred throughout the same three-year period.</i></p>
	<p>10% of the number of its Development Service Activities³ or value of the administrative cost of providing such services in one or more Distressed Communities in <u>each</u> of the 3 calendar years preceding the date of the applicable FY 2024 BEA Program NOFA.</p> <p><u>Example:</u> A CDFI Partner provided 20, 25, and 15 Development Service Activities (DSA) during calendar years 2023, 2022, and 2021, respectively, totaling 60 DSAs over the three calendar years preceding the date of the FY 2024 BEA Program NOFA. Of these DSAs 6, 4, and 2 were provided in one or more Distressed Communities during the same respective years, totaling 12.</p> <p><u>Calculation:</u> 12 DSAs provided in Distressed Communities / 60 total DSAs = 20% (DSAs provided in one or more Distressed Communities).</p>

³ Development Service Activities are defined in the BEA Program Interim Rule and include financial or credit counseling to individuals for the purpose of facilitating home ownership, promoting self-employment, or enhancing consumer financial management skills; or technical assistance to borrowers or investees for the purpose of enhancing business planning, marketing, management, financial management skills, and other comparable services as may be specified by the CDFI Fund in the FY 2024 BEA Program NOFA.

Scenario	Description & Example																
	<p><u>Determination:</u> 20% is greater than the 10% required under this scenario. Therefore, the CDFI Partner has demonstrated that it has met the requirement under this scenario.</p> <p><i>NOTE: This calculation could also be based on the total dollar amount of DSAs which occurred throughout the same three-year period.</i></p>																
Scenario II.	<p>Transacted at least 25 percent of the number of its financial transactions or dollars transacted (e.g., loans or equity investments) in one or more Distressed Communities in at least one of the three calendar years preceding the date of the FY 2024 NOFA, OR 25 percent of the number of its Development Service Activities (as defined in 12 C.F.R. 1805.104) OR value of the administrative cost of providing such services, in one or more Distressed Communities identified by the CDFI Partner, in at least one of the three calendar years preceding the date of the FY 2024 NOFA.</p> <p><u>Example:</u> A CDFI Partner provided financial transactions of \$50 million, \$45 million, and \$40 million in calendar years 2023, 2022, and 2021, respectively, which represent each of the three calendar years preceding the date of the NOFA. Of these financial transactions, \$14 million, \$10 million, and \$6 million were provided in one or more Distressed Communities during the same respective years.</p> <p><u>Calculation:</u></p> <table><tr><th>Calendar Year</th><th>Financial Transactions in Distressed Communities (\$)</th><th>Total Financial Transactions (\$)</th><th>Percentage of Financial Transactions in Distressed Communities</th></tr><tr><td>2023</td><td>\$14M</td><td>\$50M</td><td>28%</td></tr><tr><td>2022</td><td>\$10M</td><td>\$45M</td><td>22%</td></tr><tr><td>2021</td><td>\$6M</td><td>\$40M</td><td>15%</td></tr></table> <p><u>Determination:</u> The CDFI Partner demonstrated it was Integrally Involved in one of the past three calendar years (2023), since 28% is greater than the 25% required under this scenario. Therefore, it has met the requirement under this scenario.</p> <p><i>NOTE: This calculation could also be based on counting the number (volume) of financial transactions which occurred in each of the same three years.</i></p> <p>Transacted at least 25% of the number of its Development Service Activities or value of the administrative cost of providing such services in one or more Distressed Communities in at least <u>one of the three</u> calendar years preceding the date of the FY 2024 NOFA.</p> <p><u>Example:</u> A CDFI Partner provided 20, 25, and 15 Development Service Activities (DSA) during calendar years 2023, 2022,</p>	Calendar Year	Financial Transactions in Distressed Communities (\$)	Total Financial Transactions (\$)	Percentage of Financial Transactions in Distressed Communities	2023	\$14M	\$50M	28%	2022	\$10M	\$45M	22%	2021	\$6M	\$40M	15%
Calendar Year	Financial Transactions in Distressed Communities (\$)	Total Financial Transactions (\$)	Percentage of Financial Transactions in Distressed Communities														
2023	\$14M	\$50M	28%														
2022	\$10M	\$45M	22%														
2021	\$6M	\$40M	15%														

Scenario	Description & Example																
	<p>and 2021, respectively, preceding the date of the NOFA. Of these DSAs 6, 4, and 2 were provided in one or more Distressed Communities during the same respective years.</p> <p><u>Calculation:</u></p> <table><tr><th>Calendar Year</th><th>DSAs in Distressed Communities (\$)</th><th>Total DSAs (\$)</th><th>Percentage of DSAs in Distressed Communities</th></tr><tr><td>2023</td><td>6</td><td>20</td><td>30%</td></tr><tr><td>2022</td><td>4</td><td>25</td><td>16%</td></tr><tr><td>2021</td><td>2</td><td>15</td><td>13.30%</td></tr></table> <p><u>Determination:</u> The CDFI Partner demonstrated that it was Integrally Involved in one of the past three calendar years (2023) since 30% meets the minimum requirement under this scenario.</p> <p><i>NOTE: This calculation could also be based on the total dollar amount of DSAs which occurred throughout the same three-year period.</i></p>	Calendar Year	DSAs in Distressed Communities (\$)	Total DSAs (\$)	Percentage of DSAs in Distressed Communities	2023	6	20	30%	2022	4	25	16%	2021	2	15	13.30%
Calendar Year	DSAs in Distressed Communities (\$)	Total DSAs (\$)	Percentage of DSAs in Distressed Communities														
2023	6	20	30%														
2022	4	25	16%														
2021	2	15	13.30%														
Scenario III.	<p>Demonstrated that it has attained at least 10 percent of market share for a particular financial product in one or more Distressed Communities (such as home mortgages originated in one or more Distressed Communities) in at least one of the three calendar years preceding the date of the FY 2024 NOFA.</p> <p><u>Example:</u> There are a total of five financial institutions located in a BEA Distressed Community market area, including a CDFI Partner. Of the five financial institutions, three offered small dollar loans to consumers. The CDFI Partner offered small dollar consumer loans in 2023 but did not offer this product in 2022 or 2021.</p> <p><u>Calculation:</u> Since the Applicant offered the small dollar consumer loan product in one year (2023), calculation is required only for that particular year.</p> <table><tr><th>Calendar Year</th><th>CDFI Partner Offered Product in Market Area? (Yes/ No)</th><th># of Financial Institutions Offering Small Dollar Consumer Loans in Market Area, including the CDFI Partner</th><th>CDFI Partner’s Percentage of Market Share for Small Dollar Consumer Loans</th></tr><tr><td>2023</td><td>Yes</td><td>3</td><td>1 / 3 x 100 = 33%</td></tr><tr><td>2022</td><td>No</td><td>N/A</td><td>N/A</td></tr><tr><td>2021</td><td>No</td><td>N/A</td><td>N/A</td></tr></table>	Calendar Year	CDFI Partner Offered Product in Market Area? (Yes/ No)	# of Financial Institutions Offering Small Dollar Consumer Loans in Market Area, including the CDFI Partner	CDFI Partner’s Percentage of Market Share for Small Dollar Consumer Loans	2023	Yes	3	1 / 3 x 100 = 33%	2022	No	N/A	N/A	2021	No	N/A	N/A
Calendar Year	CDFI Partner Offered Product in Market Area? (Yes/ No)	# of Financial Institutions Offering Small Dollar Consumer Loans in Market Area, including the CDFI Partner	CDFI Partner’s Percentage of Market Share for Small Dollar Consumer Loans														
2023	Yes	3	1 / 3 x 100 = 33%														
2022	No	N/A	N/A														
2021	No	N/A	N/A														

Scenario	Description & Example
	<p><u>Determination:</u></p> <p>The CDFI Partner demonstrated that it was Integrally Involved in one of the past three calendar years (2023) since 33% is greater than the 10% required under this scenario. Therefore, it has met the requirement under this scenario.</p>
Scenario IV.	<p>At least 25 percent of the CDFI Partner's physical locations (e.g., offices or branches) are located in one or more Distressed Communities where it provided financial transactions or Development Service Activities during the one calendar year preceding the date of the FY 2024 BEA Program NOFA.</p> <p><u>Example:</u></p> <p>A CDFI Partner has a total of five physical locations. Of these, two are located in a BEA Distressed Community.</p> <p><u>Calculation:</u></p> <p>2 (branches in BEA Distressed Communities) / 5 (total branch locations) = 40% (total branch locations in BEA Distressed Communities)</p> <p><u>Determination:</u></p> <p>40% is greater than the 25% required under this scenario. Therefore, the CDFI Partner has demonstrated that it met this requirement.</p>