



## Bank Enterprise Award Program (BEA Program)

### ELIGIBILITY DATA TRANSITION FREQUENTLY ASKED QUESTIONS (FAQS)

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## **BACKGROUND ON THE TRANSITION TO UPDATED ELIGIBILITY DATA FOR THE BEA PROGRAM**

On January 22, 2013 the CDFI Fund announced its plans to update BEA Program eligibility criteria. A link to this announcement has been provided below:

[http://www.cdfifund.gov/what we do/BEA Program Eligibility Criteria.asp](http://www.cdfifund.gov/what_we_do/BEA_Program_Eligibility_Criteria.asp)

BEA Program eligibility data was updated as part of a larger effort being undertaken by the CDFI Fund to ensure that the data used to determine the eligibility for the programs that it administers is current. This document is intended to address questions and provide general guidance to Applicants, Awardees and other stakeholders on the CDFI Fund's release of the updated BEA eligibility data. Contact information has been provided in question 13, for answers to questions not addressed in this document.

### **1. WHAT DATA SOURCES DOES THE BEA PROGRAM RELY ON TO DETERMINE "QUALIFIED DISTRESSED COMMUNITIES"?**

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

#### **Eligibility (economic) requirements:**

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

The BEA Program is required by its authorizing legislation to obtain unemployment data from the Bureau of Labor Statistics. No such restrictions exist for population and poverty data. The BEA eligibility data previously used ("legacy data") was a combination of the Census Bureau's 2000 decennial census poverty and population data, and Bureau of Labor Statistics unemployment data.

Consistent with statutory and regulatory requirements, the updated BEA eligibility data combines 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 2006-2010 American Community Survey (ACS). The ACS replaced the Census Bureau's decennial "long form" data as the source of census tract-level income, population, and poverty data for all states, Puerto Rico, and the District of Columbia.<sup>1</sup> The 2006-2010 ACS also features updates to census tracts. For the 50 states and the District of Columbia, the 2006-2010 ACS had 73,057 total tracts compared with the 65,443 in the 2000 decennial census. To ensure close alignment with the Census Bureau's 2006-2010 ACS data, 2010 Bureau of Labor Statistics Current Population Survey (CPS) unemployment rates 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 did not change as a result of the release of updated eligibility data. The updated eligibility data is subject to the same statutory requirements as the legacy eligibility data, however it reflects more recent information obtained from the Census Bureau and Bureau of Labor Statistics.

Although the definition of a BEA "Qualified Distressed Community" did not change, Applicants and Awardees are advised that under the updated eligibility data some areas previously considered eligible are now ineligible and some areas previously considered ineligible are now eligible.

**3. HOW WILL I USE THE UPDATED DATA TO DETERMINE THE ELIGIBILITY OF A TRANSACTION OR ACTIVITY?**

The CDFI Fund decided to release the updated data as early as possible and incorporate a staggered transition period to allow Applicants and Awardees sufficient time to review the data, and plan their loans and investments accordingly. For more information on the transition period, please see question number 5.

The data was initially made available in tabular form on the BEA page of the CDFI Fund's website, [www.cdfifund.gov/bea](http://www.cdfifund.gov/bea). For more information on the contents of the tabular data, please see question number 8. The data can also be viewed at [www.cdfifund.gov/acs](http://www.cdfifund.gov/acs).

On December 11, 2013, the CDFI Fund launched the next version of its CDFI Information Mapping System, CIMS3. CIMS3 incorporates both the legacy decennial BEA eligibility data and the updated ACS BEA eligibility data and serves as the primary resource for Applicants and Awardees to determine if a transaction or activity occurred in a BEA "Qualified Distressed Community". CIMS3 is also the primary resource for CDFI Partners

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<sup>1</sup> ACS data does not include information for American Samoa, Guam, and U.S. Virgin Islands. Updated eligibility for these territories will be released when data becomes available.

to create maps that illustrate Integral Involvement in one or more BEA “Qualified Distressed Communities”.

**4. WILL THERE BE A TRANSITION PERIOD?**

Yes. There will be a transition period for the use of the updated eligibility data. The transition will begin in the FY 2014 BEA funding round and is projected to be completed in time for the FY 2015 BEA funding round.

Applicants that applied in the FY 2013 BEA funding round were instructed to continue to use the legacy eligibility data to determine if a transaction or activity occurred in a BEA “Qualified Distressed Community”. The legacy eligibility data was available in the previous version of the CDFI Fund’s CIMS mapping system.

For the FY 2014 BEA funding round, both the legacy and updated eligibility data sets were available in the CDFI Fund’s CIMS3 mapping system. FY 2014 Applicants had the choice to use either the legacy or updated eligibility data to determine if a transaction or activity occurred in a BEA “Qualified Distressed Community”. FY 2014 CDFI Partners were able to use an existing map, the legacy, or updated eligibility data to create a “Qualified Distressed Community Map” in order to illustrate Integral Involvement.

Future Applicants and CDFI Partners are advised that a full transition to the updated eligibility data will take place in the FY 2015 BEA funding round. Applicants applying in the FY 2015 BEA funding round will be required to use the updated eligibility data to determine if a transaction or activity occurred in a BEA “Qualified Distressed Community”. FY 2015 CDFI Partners will be required to use the updated eligibility data to create a “Qualified Distressed Community Map” in order to illustrate Integral Involvement.

The CDFI Fund will eventually remove the legacy eligibility data from the CIMS3 mapping system and only the updated eligibility data will remain.

**5. WILL THE UPDATED ELIGIBILITY DATA AFFECT PERSISTENT POVERTY COUNTY (PPC) DESIGNATION?**

The Consolidated Appropriations Act of 2012 (Public Law 112-74, enacted on December 23, 2011) required that not less than 10 percent of awarded funds be used for projects that serve populations living in Persistent Poverty Counties (PPCs). Using data from the 1990 and 2000 decennial censuses and the 2006-2010 ACS, the CDFI Fund determined that 384 counties qualify as “Persistent Poverty Counties,” based on the criteria outlined in Public Law 112-74.

The Census Bureau’s 2006-2010 ACS data was considered in determining which counties qualify as PPC’s. Therefore, the release of updated BEA eligibility data will not have any

effect on this determination and PPC designation. The list of the 384 PPCs are located on the CDFI Fund's website. For a link to this list, please see question number 7.

The PPC requirement only applies to the FY 2012 and FY 2013 BEA funding rounds. Prior BEA Program Awardees that committed to deploying a percentage of their FY 2012 or FY 2013 awards in PPCs are still required to fulfill those commitments. See questions #11 and #12 for determining which eligibility data to use when submitting FY 2012 and FY 2013 BEA Program Use of Award Reports.

FY 2014 BEA Awardees did not have a PPC requirement.

## **6. HOW DO I IDENTIFY A PERSISTENT POVERTY COUNTY (PPC)?**

A list of the 384 counties that qualify as PPCs can be found on the CDFI Fund's website. A link to this list has been provided below:

<http://cdfifund.gov/docs/List%20of%20384%20persistent%20poverty%20counties.xls>

## **7. HOW DO I DETERMINE THE ELIGIBILITY OF AN ACTIVITY OR TRANSACTION THAT OCCURRED IN A CENSUS TRACT LOCATED IN AN AMERICAN INDIAN RESERVATION?**

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. In order for a transaction or activity in a census tract 'partially' within an American Indian Reservations to qualify, the physical address of the transaction must be within the reservation.

With the release of the CDFI Fund's CIMS3 mapping system, BEA Applicants and Awardees now have the option to either use CIMS3 or the tabular data to determine if the transaction or activity occurred 'fully' or 'partially' within an American Indian Reservation. BEA Applicants and Awardees using CIMS3 to determine the eligibility of a transaction or activity that may be either 'fully' or 'partially' within an American Indian Reservation are advised to search using the physical address of the where the transaction occurred. CIMS3 will geocode the address and provide an accurate eligibility determination.

BEA Applicants and Awardees using the tabular data to determine the eligibility of a transaction that may be either 'fully' or 'partially' within an American Indian Reservation are advised to review column I, "Is the census tract within an American Indian Reservation", of the tabular data. As indicated above, Applicants and Awardees attempting to determine the eligibility of a transaction or activity in a census tract 'partially' within an

American Indian Reservation will need to confirm that the physical address of the transaction is located within the reservation. The CDFI Fund encourages Applicants and Awardees to use CIMS3 to geocode the address and to provide an accurate eligibility determination.

## **8. WHAT INFORMATION IS INCLUDED IN THE TABULAR DATA RELEASED ON THE CDFI FUND’S WEBSITE ON JULY 29, 2013?**

With the release of the CDFI Fund’s CIMS3 mapping system, BEA Applicants and Awardees will no longer need to solely rely on the tabular 2006-2010 American Community Survey data to determine if a transaction or activity occurred in a BEA “Qualified Distressed Community”.

The CDFI Fund recognizes that some BEA Applicants and Awardees may prefer the tabular data and therefore, the tabular 2006-2010 American Community Survey data is still available on the CDFI Fund’s website. A link to the data has been provided below.

[http://www.cdfifund.gov/what we do/acs/BEA-Eligibility.asp](http://www.cdfifund.gov/what_we_do/acs/BEA-Eligibility.asp)

The tabular data includes the following fields:

- 11 digit census tract
- State the tract is located in
- County the tract is located in
- BEA Program eligibility determination (“Fully Qualified” or “Partially Qualified”<sup>2</sup>)
- Reason for eligibility determination:
  - American Indian Reservation (“Fully”, “Partially” or “No”)
  - Poverty rate (“Yes” or “No”)
  - Population (“Yes” or “No”)
  - Unemployment rate (“Yes” or “No”)

Descriptions on each of these fields will be contained in the “Data Notes” tab.

## **9. MY ORGANIZATION IS A CDFI PARTNER. HOW DO I USE THE UPDATED ELIGIBILITY DATA RELEASED IN TABULAR FORM TO CREATE A DISTRESSED COMMUNITY MAP?**

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<sup>2</sup> Partially Qualified census tracts will have a footnote indicating: an individual census tract noted as Partially Qualified will not solely satisfy the definition of a BEA Distressed Community, but the updated CIMS system (tentatively scheduled to be released in late September of what year?) should be used to determine if one or more contiguous census tracts may make the area a Fully Qualified Distressed Community, when aggregated.

This question is no longer applicable. FY 2014 CDFI Partners were able to use the legacy or updated eligibility data in the CIMS3 mapping system to create a “Qualified Distressed Community Map” in order to illustrate Integral Involvement. For future funding rounds, CDFI Partners will continue to use the updated eligibility data in the CIMS3 mapping system to create a “Qualified Distressed Community Map”.

**10. MY ORGANIZATION IS A FY 2012 BEA PROGRAM AWARDEE. WHICH DATA WILL I USE TO DEPLOY MY AWARD AND COMPLETE THE USE OF BEA PROGRAM AWARD REPORT?**

FY 2012 BEA Program Awardees were required to use the legacy eligibility data to determine where to deploy their BEA Program Awards. This included Awardees that made a Persistent Poverty Commitment and/or those that received awards of over \$50,000 that were required to complete the ‘Use of BEA Program Award’ form included as part of their Award Agreement.

**11. MY ORGANIZATION IS A FY 2013 BEA PROGRAM AWARDEE. WHICH DATA WILL I USE TO DEPLOY MY AWARD AND COMPLETE THE USE OF BEA PROGRAM AWARD REPORT?**

FY 2013 BEA Program Awardees may use either the legacy or updated eligibility data to determine where to deploy their BEA Program Awards. This includes Awardees that made a Persistent Poverty Commitment and/or those that received awards of over \$50,000 that are required to complete the ‘Use of BEA Program Award’ form included as part of their Award Agreement. The reporting deadline for FY 2013 BEA Program Awardees is June 30, 2015.

**12. MY ORGANIZATION IS A FY 2014 BEA AWARDEE. WHICH DATA WILL I USE TO DEPLOY MY AWARD AND COMPLETE THE USE OF BEA PROGRAM AWARD REPORT?**

FY 2014 BEA Program Awardees will use the updated eligibility data to determine where to deploy their BEA Program Awards. This includes Awardees that received awards of over \$50,000 that are required to complete the ‘Use of BEA Program Award’ form included as part of their Award Agreement. The reporting deadline for FY 2014 BEA Program Awardees is June 30, 2016.

**13. WILL THE UPDATED ELIGIBILITY DATA BE UPLOADED INTO THE CDFI FUND’S COMMUNITY IMPACT MAPPING SYSTEM (CIMS) FOR GEOCODING?**



The previous CIMS mapping system was replaced by the CDFI Fund's CIMS3 mapping system released on December 11, 2013. CIMS3 includes the updated eligibility data.

**14. SINCE THE UPDATED ELIGIBILITY IS NOT AVAILABLE FOR GEOCODING IN CIMS, WHERE CAN I GO TO GEOCODE AN ADDRESS?**

This question is no longer applicable. The updated eligibility data has been available in CIMS3 since December 11, 2013. Applicants should now use CIMS3 to geocode addresses.

**15. WHO SHOULD I CONTACT IF I HAVE ADDITIONAL QUESTIONS?**

You may contact the CDFI Fund Help Desk by phone at (202) 653-0421 or via e-mail at [cdfihelp@cdfi.treas.gov](mailto:cdfihelp@cdfi.treas.gov).