



# Community Development Financial Institutions (CDFI) Fund

# CDFI Certification Application Training

August 10, 2007



# Introduction to the CDFI Fund

- The Seven CDFI Certification Criteria
- Designating a Target Market
  - Types of Target Markets
  - Using CIMS
- Checklist, Timeline, and Contact Information

#### **CDFI** Fund Mission



The mission of the CDFI Fund (the Fund) is to expand the capacity of financial institutions to provide credit, capital, and financial services to underserved populations and communities in the United States.

# **Programs and Initiatives**



- The Fund achieves its mission by directly investing in and supporting Community Development Financial Institutions (CDFIs), Community Development Entities (CDEs), and other financial institutions through the following programs and initiatives:
  - CDFI Program: Financial Assistance (FA) and Technical Assistance (TA);
  - Native Initiatives (NACA);
  - Bank Enterprise Award (BEA) Program; and
  - New Markets Tax Credit (NMTC) Program.

#### **CDFI** Certification



#### Who is CDFI certified?

- Loan Funds (non-profit and for-profit);
- Insured or State-Insured Credit Unions;
- Insured Banks and Thrifts;
- Depository Institution Holding Companies; and
- Venture Capital Funds.

# **CDFIs: Special Entities**



#### Emerging "Start-Up" CDFIs

- Organizations that are new to community development financing and do not meet the seven certification criteria should *not* complete the certification application.
- Instead, the potential applicant may be eligible for funding via the Technical Assistance Program to help the organization meet the certification criteria.

# **CDFIs: Special Entities**



#### Depository Institution Holding Companies

- Depository Institution Holding Companies (DIHCs) may qualify as a CDFI only if the applicant individually <u>and</u> collectively with its affiliates meet each of the seven certification criteria.
- Affiliates of DIHCs may qualify only if the DIHC qualifies.
- Subsidiaries of Insured Depository Institutions may qualify only if the Insured Depository Institution <u>and</u> its Subsidiaries qualify.

# **CDFIs: Special Entities**



#### Native American CDFIs

- Organization that directs at least 50% of its activities to Native American Communities are eligible to be recognized by the Fund as a Native American CDFI.
  - Native Community is defined as Native
     American, Alaska Native, and Native Hawaiian people or communities.
- The organization must also meet the Target Market requirement.

#### **CDFI** Certification



- Why become certified as a CDFI?
  - Access to Financial and Technical Assistance dollars from the CDFI Fund;
  - Benefits of a rigorous self-examination process (necessitated by the CDFI Fund certification and funding applications); and
  - Leverage other Funding Sources.

# **CDFI Program: Financial Assistance**



- **FA** An FA grant, loan, equity investment, or deposit provides capital to certified CDFIs to serve Target Markets, be viable financial institutions, and effectively use and leverage Fund awards.
  - FA requires non-federal matching funds.
  - Award Request Maximum (FY2007)
    - Category 1 (SECA): \$500,000
    - Category 2 (Core): \$2 million
  - NACA Award Request Maximum (FY2007): \$500,000

# **CDFI Program: Technical Assistance**



- TA Only A TA grant allows a CDFI or an entity proposing to become a CDFI to build its capacity to serve its Target Market.
  - TA does not require matching funds.
  - TA can be requested to help applicant become certified as a CDFI.
  - Award Request Maximum (FY2007): \$100,000.
  - NACA Award Request Maximum (FY2007): \$150,000

# **BEA Program: Overview**



#### Bank Enterprise Award Program

- Provides awards to insured depository institutions for engaging in lending, investment, and service activities to CDFIs or to economically distressed communities.
- Rewards actual increases in the dollar volume of Qualified Activities from a Baseline Period to a later Assessment Period.

# **Application Completion Overview**



- Review regulations and certification criteria.
- Create or access applicant's "myCDFI Fund" account.
- Designate the applicant's Target Market and save to Signature Page.
- Complete and submit the applicant's Signature Page.
- Complete the applicant's CDFI Certification Criteria Questionnaire.
- Complete the applicant's required documentation attachments as directed in the Completeness Checklist.
- Mail one original and one copy of the Certification
   Application as instructed to the CDFI address listed in the application instructions.

# **Completeness Checklist**



- Completeness Checklist Cover Sheet (including name, EIN, and DUNS number)
- Signature Page
- CDFI Certification Criteria Questionnaire
- Tables
  - Asset Information Table
  - Staff Allocation Table
  - Target Market Table
  - Development Services Table
  - Accountability Table
- Documentation Attachments



# **Questions?**

#### **AGENDA**



Introduction to the CDFI Fund

# The Seven CDFI Certification Criteria

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# Community Development Financial Institutions



- Can be a for-profit or not-for-profit entity that meets the following requirements:
  - A legally-existing entity,
  - Primary Mission of Community Development,
  - Predominantly a Financing Entity,
  - Provides <u>Development Services</u> in conjunction with financing,
  - Principally serves a Target Market,
  - Accountable to the Target Market, and
  - A Non-governmental Entity.

### **CDFI Certification Criteria**



1. Must be a Legal Entity.

# **Criteria: Legal Entity**



## Requirements

As of the date the application is signed and submitted, the applicant must be duly organized and validly exist.

- All organizations must have an EIN.
- Regulated depository institutions must have a charter issued by the appropriate Federal or State regulatory agency, such as:
  - Federal Deposit Insurance Corporation,
  - National Credit Union Administration,
  - Office of the Comptroller of Currency,
  - Office of Thrift Supervision, or
  - State regulatory agency.

# **Criteria: Legal Entity**



#### Documents

- A copy of the applicant's organizing documents including any amendments.
  - Regulated depository institutions: A Certificate of Incorporation or Organization Certificate issued by appropriate agency.
- A copy of the applicant's IRS notification regarding assignment of an EIN.
- Applicants that issue stock: Narrative and supporting stock certificate summary reports.

• Tables: None

# **Criteria: Legal Entity**



#### • Remember...

The applicant's organizing documents, including any amendments, must be:

- signed,
- stamped, and
- filed with the appropriate state agency.

# **CDFI Certification Requirements**



# 2. Primary Mission must be Community Development.



## Requirements

The applicant's activities must be directed towards improving the social or economic conditions of:

- Low income individuals,
- Individuals that lack adequate access to capital and/or financial services,
- Distressed communities, or
- Underserved people or communities.
- \* DIHCs and Subsidiaries or Affiliates of DIHCs: Primary Mission requirements must be met individually and collectively for <u>each</u> of the entities.



## Requirements (cont'd)

- Organization missions directed solely towards moderate income, disabled, single sex, and minority populations must have corroborating activities in the designated, eligible Target Market.

Also refer to related requirements under "Target Market Criteria."



#### Documents

- A copy of the applicant's organizational documents that provide evidence of a primary mission of promoting community development.
  - Organizations whose organizational documents **do not** reference a qualifying mission: Provide boardapproved narrative describing collective activities and products that evidence a qualifying primary mission.
- NCUA designated Low-Income Credit Unions: A copy of the applicant's designation letter from the NCUA.

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- Documents (cont'd)
- DIHCs and either Subsidiaries or Affiliates of DIHCs: Official documentation referencing each of the entities primary mission statements.

• Tables: None



• Remember...

The applicant must submit *board-approved* documentation. Examples of documentation that are **not** accepted are:

- Pamphlets,
- Brochures,
- Printed articles, or
- Other marketing materials.

# **CDFI Certification Requirements**



3. Must predominantly be a Financing Entity.



### Requirements: General

The applicant must demonstrate that its predominate business activity is the provision of arms-length transactions, financial products, and/or other similar financing, and development services.

- Regulated Insured Depository Institutions, including Credit Unions, and Depository Institution Holding Companies: It is presumed that these types of applicants meet the Financing Entity criteria.



## Requirements: Specific

A non-regulated applicant must demonstrate that it:

- Has begun to use its own capital to provide financial products to non-affiliated entities;
- Engages in direct financing activities as reflected on its financial statements and/or executed notes;
- Dedicates a majority (more than 50%) or predominance of its assets to financial products, development services, and/or other financing;

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- Requirements: Specific (cont'd)
- Dedicates a majority (more than 50%) or predominance of its staff-time to financial products, development services, and/or other financing;
- Maintains sufficient capital to continue financing activities for at least three months (one quarter).



#### Documents

- Regulated Insured Depository Institutions, including Credit Unions, and Depository Institution Holding Companies: No additional documentation is needed to demonstrate that the applicant meets the Financing Entity criteria.
- Non-regulated Financial Institutions:
- A copy of the organization's most recent audited year-end financial statements; and
  - Organizations that have not completed a fiscal year: A copy of the most recent year-to-date internal financial statements.

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# Documents (cont'd)

- A two-page (maximum) narrative statement addressing each of the following issues:
  - Identify which financial statement accounts reflect financial product activities and include specifics;
  - Identify the percentage of each balance sheet asset dedicated to financial products, devo. services, and other similar financing and how each asset is used;
  - State how each FTE position, consultant, and/or affiliate staff supports financial products and development services activities;
  - State the amount of liquid assets available for financing activity.



#### Tables

- Asset Information Table
- Staff Allocation Table



#### Remember...

- A non-regulated applicant must demonstrate that it has begun (not just plans to begin) to use its own capital to provide Financial Products (loans) to non-affiliated entities.
- An applicant must demonstrate that it is actively engaged in providing financial products to its Target Market(s) and that it has the capacity to continue to do so. A single transaction is not enough activity to meet the Financing Entity requirement.
- More than 50% of the organization's assets and staff time must be dedicated to Financial Products, Development Services, and/or other financing.



# **Questions?**

### **CDFI Certification Requirements**



4. Must principally serve the designated Target Market.



#### Requirements

The applicant must demonstrate that:

- It serves an eligible Target Market.
  - There are three types of Target Markets:
    - Investments Areas (IA),
    - Low-Income Target Populations (LITP), and
    - Other Target Populations (OTP).
  - More than one type of Target Market may be served.
- At least 60% of its activities are directed towards the eligible Target Market.
  - More than one type of Target Market may need to be designated to meet the 60% benchmark.



#### Documents

- Electronic Target Market map and information via myCDFI account and CIMS;
- Narrative explaining how the applicant verifies that its financial products and development services are directed toward the eligible Target Market(s);
- *If designating one or more Investment Areas:* Narrative describing the significant unmet capital or financial services needs within <u>each</u> Investment Area;

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- Documents (cont'd)
- If designating Asian Americans, Women, Other Pacific Islanders, or "Other" as an Other Targeted Population:
  Narrative describing the significant unmet capital or financial services needs for each selected targeted population;
  - Reference to specific studies or surveys should be included.
- Applicants serving other CDFIs (i.e. CDFI Intermediaries):
  Narrative explaining how the applicant's financial products
  and development services serve one or more eligible
  Target Markets.



- Tables
  - Target Market Table



#### Remember...

- The two determinants in assessing whether an applicant meets this requirement are:
  - The applicant has designated at least one eligible Target Market;

#### and

- At least 60% of the applicant's activities are directed toward an eligible Target Market.

- Applicants may not double-count clients between Target Markets (i.e. same client as a member of an OTP and a LITP).

### **CDFI Certification Requirements**



5. Must be accountable to the designated Target Market.



#### Requirements

The applicant must demonstrate that it is accountable to its designated Target Market(s). Accountability can be demonstrated via one or more of the following methods:

- Governing Board,
- Advisory Board,
- Focus group,
- Community meeting, or
- Surveys within the Target Market.

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#### Requirements (cont'd)

- \* Governing and Advisory Boards
  - Eligible board members must collectively represent each designated Target Market.
  - For a board member to be eligible, he/she must:
    - Reside or own a business in an eligible Investment Area;
    - Serve as an elected official of an eligible Investment Area or Target Population service area;
    - If designating a LITP: Qualify as a low-income individual; or
    - If designating an OTP: Be a member of an eligible OTP.
- \* Focus groups, community meeting, surveys, etc.
  - These methods must be incorporated into the applicant's decision making process.



#### Documents

- If the applicant is demonstrating accountability via a(n):
  - Advisory Board: Narrative that states how the Board was created and functions including how input is relayed to the applicant's Governing Board;
  - Focus group or community meetings: Narrative that states how the meeting functions including how input is relayed to the applicant's Governing Board;
  - Customer surveys: Narrative how the survey is developed and delivered and how data is compiled and relayed to the applicant's Governing Board.



- Tables
  - Accountability Table



- Remember...
- The applicant must demonstrate accountability to *each* Target Market that the organization identifies.

- Governing and Advisory Board members must be involved currently with the Target Market they represent (i.e. currently resides or owns a business in the Target Market).

- Applicants should provide *detailed*, *comprehensive* information regarding each board member.

### **CDFI Certification Requirements**



6. Must provide Development Services in conjunction with financing activities.



#### Requirements

An applicant must demonstrate that it provides development services in conjunction with the financial products it provides.

- There is not a specific percentage of total activities that must be dedicated to development services, but at least 50% of the applicant's total assets must be:
  - Provided through a combination of development services and financial products activities; and
  - Be directed to the designated Target Market.
- Staff, affiliate staff, or a contractor may provide the development services as long as the applicant is directing the provision of services.



#### Documents

- Narrative that describes:
  - Each development service;
  - The relationship between the development service and its link to a financial product provided by the applicant.
- Narrative that identifies and describes any contractual relationship between the applicant and an affiliate or non-affiliate entity that provides development services to the applicant's Target Market.
- A copy of the services contract/agreement for any nonaffiliate entity that provides development services on behalf of the applicant.



- Tables
  - Development Services Table



#### Remember...

- There must be a clear and direct link between an applicant's Development Services and its Financial Products.

- If non-affiliated entities are providing development services, narrative must be provided that clearly describes how the applicant is directing the provision of services by the non-affiliated entity and not just referring clients to another source.

### **CDFI** Certification Requirements



7. Must not be a Government Entity.



#### Requirements

An applicant must demonstrate that:

- It is not an agency or instrumentality of the United States or any state or political subdivision, or that it is controlled by any government entity.
- Its governing board membership or executive management are not controlled by any government entity.



#### Documents

- Narrative that describes the nature of any contractual or financial relationship the applicant has with any Federal, State, or local entity.
- For each "Yes" response to the Non-Government Entity criteria questions in the CDFI Certification Criteria Questionnaire: Narrative explaining the control circumstances.



- Tables
  - Accountability Table



#### • Remember...

- A "Yes" response to the Non-Government Entity criteria questions in the CDFI Certification Criteria Questionnaire does <u>not</u> mean the applicant is ineligible for certification automatically.
  - However, a thorough explanation regarding each "Yes" response should be provided.

# CDFI Certification Criteria Questionnaire



- CDFI Certification Criteria Questionnaire
  - Total of 15 questions that captures specific information regarding the following criteria:
    - Primary Mission,
    - Financing Entity,
    - Target Market,
    - Development Services, and
    - Non-Government Entity.

 Information listed on Questionnaire should match information provided in other documentation in the application.



# **Questions?**

#### **AGENDA**



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- The Seven CDFI Certification Criteria

# Designating a Target Market

- Types of Target Markets
- Using CIMS
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#### **Types of Target Markets**



#### Investment Areas

An Investment Area is a geographic unit (State, County, census tract, block group, Indian/Native areas), or contiguous geographic units entirely located within the United States geographic boundaries that:

- Has a population poverty rate of at least 20%; or
- Has an unemployment rate 1.5 times the national average; or
- 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; or
- For a non-metropolitan area has an MFI at or below 80% of the greater either the statewide or national non-metropolitan MFI; or
- Is wholly located within an Empowerment Zone or Enterprise Community.

#### **Types of Target Markets**



#### Low Income Targeted Populations

A low-income targeted population for a geographic unit is comprised of individuals whose family income is:

- For metropolitan areas not more than 80% of the metropolitan area MFI; or
- For non-metropolitan areas, not more than the greater of 80% of either the area or statewide non-metropolitan MFI.

### **Types of Target Markets**



#### Other Targeted Populations

Serving an Other Targeted Population requires providing financial products to an identifiable group of individuals that lack adequate access to capital and have historically been denied credit.

#### The designated Other Targeted Populations are:

- African Americans,
- Alaska Natives residing in Alaska,
- Asian Americans,
- Hispanics,
- Native Americans,
- Native Hawaiians residing in Hawaii,
- Women,
- Other Pacific Islanders residing in other Pacific Islands, and
- Other (reviewed and approved on a case-by-case basis).

### **Community Impact Mapping System**



- Community Impact Mapping System (CIMS)
  - System creates an electronic version of an organization's Target Market map regardless of type (i.e. Investment Areas, Low-Income Targeted Populations, and Other Targeted Populations).

 Target Market map can be linked electronically to a CDFI Certification Signature Page.



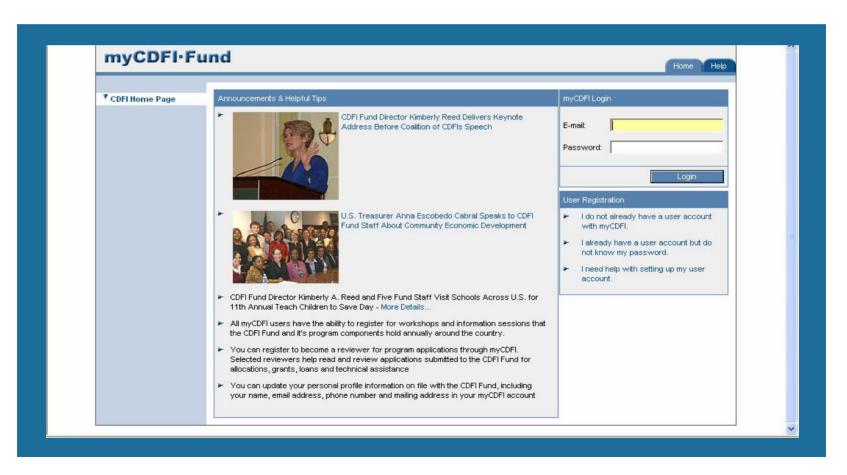
 An on-line tutorial with instructions on how to navigate CIMS can be accessed via an applicant's myCDFI Fund account and the CIMS Homepage.

 In addition, detailed instructions on how to use CIMS to designate a Target Market and to create a corresponding map can be found on the CDFI Certification webpage under "Application Materials."

 A list of CDFI Program qualifying tracts and counties is available via an applicant's myCDFI Fund account and the CIMS Homepage.

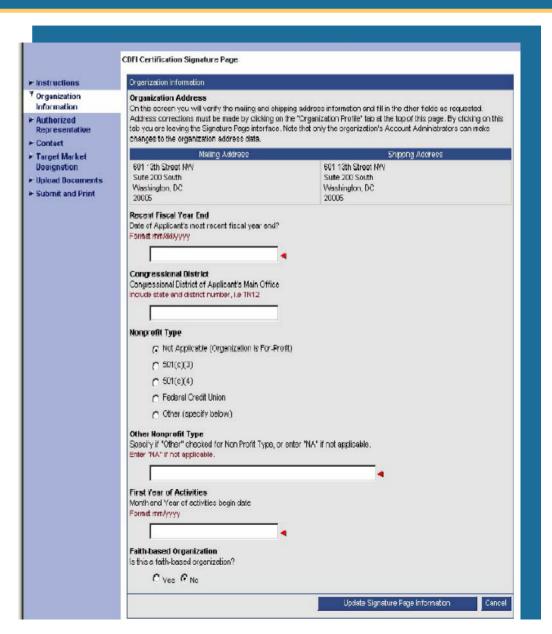


 Access CIMS via the organization's myCDFI Fund account. (Go to www.cdfifund.gov to log into myCDFI Fund account.)



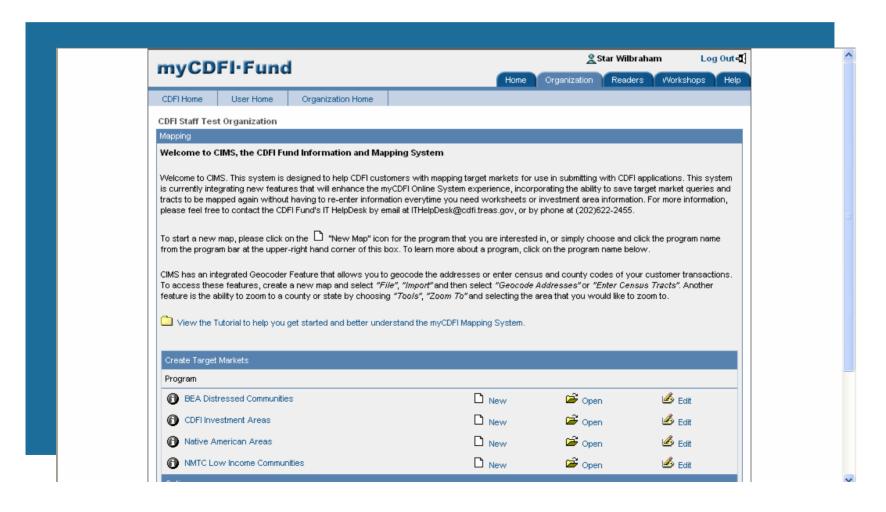


Create a new <u>or</u>
 log-in into an
 existing CDFI
 Signature Page.
 <u>Do not</u> submit the
 Signature Page at
 this time.



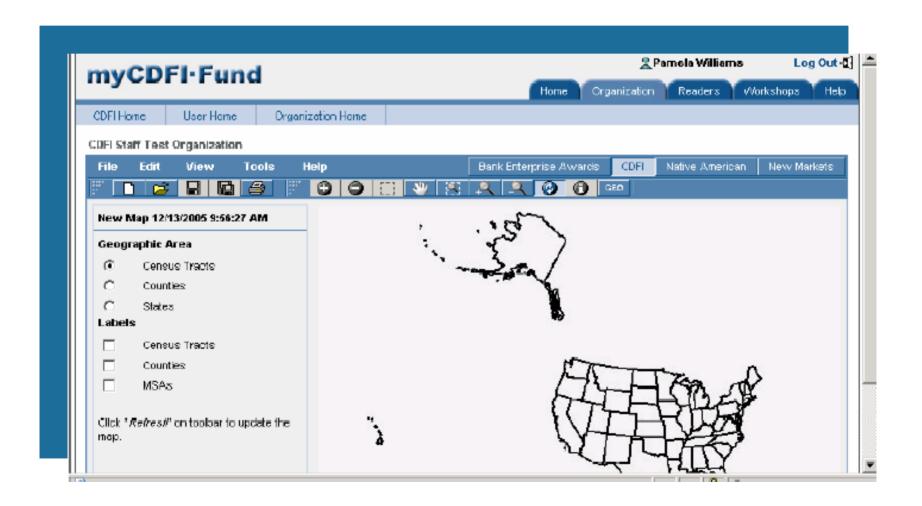


 Access CDFI CIMS maps via "CDFI Investment Areas" on the CIMS Homepage.





Designate a Target Market by creating a map.



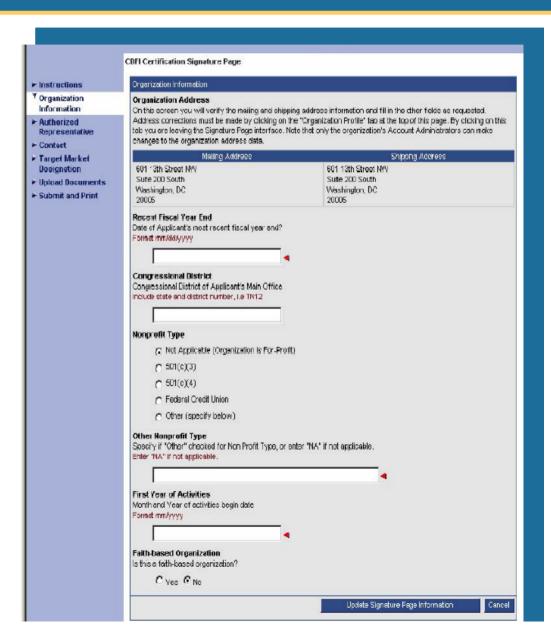


 Review report generated by map for "Investment Area" Target Markets.

	WIC	KS MSA	000	23033004300	1310	0.101	0.513	0.10	2.27	103	NO	103
26	МО	Kansas City, MO KS MSA	095	29095005200	1497	0.268	0.574	0.13	2.24	Yes	No	No
27	MO	Kansas City, MO KS MSA	095	29095005400	1122	0.337	0.428	0.135	2.33	Yes	No	No
28	МО	Kansas City, MO KS MSA	095	29095005601	2010	0.215	0.623	0.182	3.14	Yes	Yes	Yes
29	МО	Kansas City, MO KS MSA	095	29095005602	1859	0.274	0.565	0.202	3.48	Yes	Yes	Yes
Total 2	29				42353	0.308	0.446	0.193	3.336			11
			unties th	at do not meet inv	estment	0						
Percent of total population in tracts/counties not meeting Investment Area criteria						0%						
Total number of Hot Zone tracts/counties(any type)						11						
Hot Zones as a percentage of Investment Area tracts/counties						37.93%						
Hot Zones population as a percentage of Investment Area population						60.53%						
popula	Are all geographic units in Investment Area contiguous?											
	i geogra											

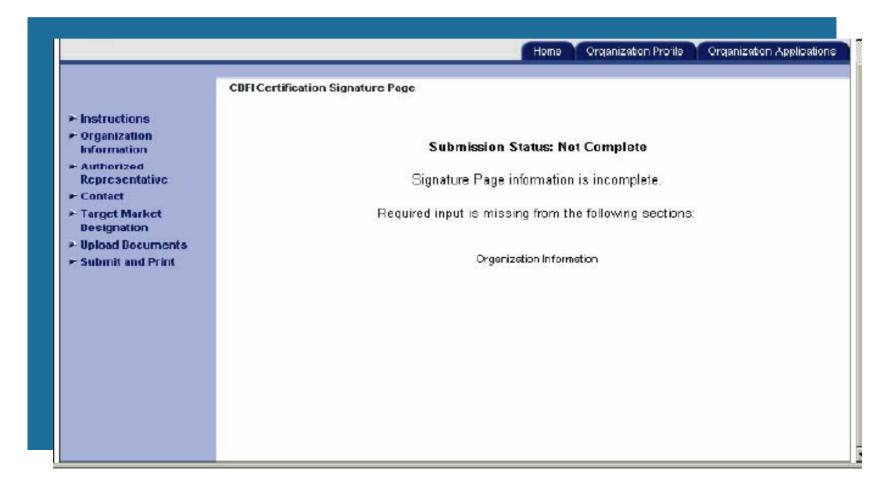


Finish the Signature
 Page. Be sure to
 complete the Target
 Market Designation
 and the Upload
 Documents screens.





Submit Signature Page with uploaded map electronically.
 New applicants need to print and submit a hardcopy of the application, as well.



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#### **Timeline**



 CDFI Certification applicants who intend to apply for FY2008 CDFI Financial Assistance must submit their Certification Application by the date specified in the CDFI FY2008 Notice of Funds Availability (NOFA).

 All other Certification applicants may submit their applications at any time.

 Certification decisions are expected to be completed within 90 days approximately. In the event more than 90 days is needed to review the application, the Fund will contact the applicant.

#### **Contacting the Fund**



- Certification and Programmatic Support:
  - cdfihelp@cdfi.treas.gov or 202.622.6355
- Grants Management Support:
   grantsmanagement@cdfi.treas.gov or 202.622.8226
- Compliance Support:
  - cme@cdfi.treas.gov or 202.622.8226
- Technical Support:
  - ithelpdesk@cdfi.treas.gov or 202.622.2455
- Legal Counsel Support:
  - See "How to Request a Legal Review" at www.cdfifund.gov



## **Questions?**