



SONES & WHITE

CONSULTANTS

November 22, 2022

Via Email Only

Ms. Heather Hunt
Program Manager
Office of Compliance Monitoring and Evaluation
CDFI Fund
U.S. Department of the Treasury
ccme@cdfi.treas.gov

Re: Comments on the CDFI Fund's Uses of Award Report Form

Dear Ms. Hunt:

Sones & White Consulting (SWC) respectfully submits the following comments in response to the Fund's Notice of Information Collection and Request for Public Comment published in the Federal Register on September 26, 2022. SWC is a consulting firm headquartered in Mississippi. We are writing on behalf of our firm and the 68 community banks and 63 bank holding companies to which we provide CDFI consulting services across Alabama, Arkansas, Florida, Georgia, Kentucky, Louisiana, Mississippi, Missouri, South Carolina, Tennessee, and Texas. Our consultants have assisted banks and their holding companies in preparing hundreds of Uses of Award Reports over the past decade.

We are thankful for the opportunity to comment on the CDFI Fund's Uses of Award Reports and appreciate how responsive the Fund has always been to questions and concerns from the CDFI industry. We also want to acknowledge the CDFI Fund's extraordinarily busy season over the past few years and appreciate your dedication to promoting community development in our nation's distressed communities.

Our overall sentiment is that the Uses of Award Reports do not need to change. We believe they appropriately fit the applicable awards, have practical and appropriate utility, and are not too burdensome to prepare and submit. Additionally, we want to recognize that the new Awards Management Information System (AMIS) Lightning system provides an efficient and clear way to submit these reports. Finally, we have found all instructions to be very useful and beneficial.

We appreciate the time and consideration put into creating these reports, both through the AMIS platform and through the careful preparation of the report guidance.

The structure of the Uses of Award report appropriately collects the information necessary to confirm the proper award use. We find the report creation and submission not unduly burdensome and believe the reports are straightforward to complete. We would ask and recommend that the CDFI Fund not make any changes to the Uses of Award report but instead maintain it as it currently stands.

In conclusion, Sones & White Consulting greatly appreciates the opportunity to provide comments and feedback from the perspective of this firm and its many CDFI bank clients, and we are grateful for the intentionality of the Fund to make these compliance requirements appropriate to the awards.

If you have any questions, or if we may be of further assistance, please do not hesitate to contact Ben Sones or Everett White at 601.790.1500 or bsones@soneswhite.com and ewhite@soneswhite.com.

With much appreciation,

SONES & WHITE CONSULTING, LLC



Ben Sones
Member



Everett White
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