



June 26, 2017

Mr. Greg Bischak
Program Manager for Financial Strategies and Research
Department of Treasury, Community Development Financial Institution Fund
1500 Pennsylvania Ave NW
Washington, DC 20220
ccme@cdfi.treas.gov

Dear Mr. Bischak,

This letter is in response to the request for public comment on the CDFI Program and NMTC Program CIIS Annual Report published in the Federal Register, Vol. 82, No. 80 on April 27, 2017. Clearinghouse CDFI provides the following comments:

1. Several data points in Annual CIIS Report are duplicative to the Annual Certification Report. Clearinghouse CDFI recommends that the CDFI Fund consolidate data requests or refer to other compliance reporting for same data point. Clearinghouse CDFI has identified the following duplicative data:

#	Data Point - Annual Certification Report	Other Compliance Report
Part 1 – Q. 5a	% of FTE and contractor time dedicated to providing Financial products and/or services	Annual CDFI ILR Report
Part 1 – 5b	% of FTE and contractor time dedicated to providing Development Services	Annual CDFI ILR Report
Part 2 – 5a	At least 60% of the organization’s transactions are directed towards serving its approved target markets	Annual CDFI TLR Report (can be inferred through LITP, OTP, IA end user)
Part 3	Generally, the financial questions from Q. 1-6	Annual CDFI ILR Report
Part 4 – Q. 1	Total outstanding loan portfolio, total charge offs, and total recoveries	Annual CDFI TLR Report
Part 4 – Q. 3	Loan Portfolio Breakdown	Annual CDFI TLR Report



2. Clearinghouse CDFI recommends that CDFI Fund update its CIIS reporting software to minimize the burden of collection and reporting. The current system is providing false notifications of errors when validating loans. An “error” status is given, however, there are actually no errors. Without making any changes, the loan can pass validation if the loan is selected one at a time to validate. An erroneous “error” status causes delay and confusion in the reporting process.
3. Clearinghouse CDFI recommends that the current CIIS system be compatible with both Chrome and Internet Explorer. Currently, some functions are not available and/or visibility issues when using Chrome.
4. Clearinghouse CDFI recommends allowing CDFIs or CDEs with Salesforce based systems to be integrated with AMIS to minimize the burden of reporting.

Clearinghouse CDFI believes that these recommendations can reduce paperwork and burden on CDFIs. If you need more information or clarification, please do not hesitate to contact us.

Sincerely,

Douglas J. Bystry

Douglas J. Bystry
President/CEO
Clearinghouse CDFI