

**From:** Michael Abbate [<mailto:MAbbate@common-capital.org>]

**Sent:** Tuesday, August 27, 2013 12:54 PM

**To:** CDFIHELP

**Subject:** Comments on CIIS reporting

Mr. Bischak:

I am emailing to provide some comments in response to the recent request for public comment on the CDFI Fund's CIIS reporting. I have been submitting the report for 4 years and while our loan software uploads the data for the Transaction Level report relatively smoothly, I spend about 20 hours cleaning up mostly the FIPS code and address sections of the data. This is very tiresome and cumbersome work as the FIPS codes I have in my system are often not validated by CIIS so I need to manually enter all addresses by hand. I am not sure why the CDFI Fund needs that level of detail, including business address and owner address but I hope the data it is being put to good use given the time it takes me to comply with the data collection requirements.

Also, it would be good to know exactly what is done with everyone's data once you collect it. Out of all the Federal programs we are involved with, the CIIS reporting is by far the most comprehensive and time consuming for our small staff here at Common Capital. I hope that the comments can lead to some streamlining and ease the burden these reports put on myself and our staff. Thank you.

Michael Abbate

CHIEF OPERATING OFFICER

**Common Capital, Inc.**

4 Open Square Way, Suite 407

Holyoke, MA 01040

**p.** (413) 420-0183 **x**102

**f.** (413) 420-0543

[www.common-capital.org](http://www.common-capital.org)



*(Formerly Western Massachusetts Enterprise Fund, Inc.)*

[Click here to join Common Capital's Email List](#)