

Select CDFI Program/NACA Program FA Assistance Agreement Changes– FY 2024 vs FY 2025

Issue	FY 2024 agreement	FY 2025 agreement	Notes
Definition of "Eligible Market"	Included low-income people plus African American, Hispanic, Native American, Native Hawaiian, Alaska Native, Other Pacific Islander, Filipino, Vietnamese, and persons with disabilities.	Now limited to Low-Income, Native American, Native Hawaiian, Alaska Native, or Persons with Disabilities, in addition to qualifying geographic areas. The racial/ethnic categories other than Native populations are gone.	Closely mirrors the change in the revised FA application released September 2025.
Executive Orders	Section 5.1 required compliance with applicable laws and Executive Orders and specifically mentioned environmental requirements.	Section 5.1 now specifically calls out several recent Executive Orders (EO 14332, IMPROVING OVERSIGHT OF FEDERAL GRANTMAKING), (EO 14173, ENDING ILLEGAL DISCRIMINATION AND RESTORING MERIT-BASED OPPORTUNITY), (EO 14281, Restoring Equality of Opportunity and Meritocracy), and (EO 14218, ENDING TAXPAYER SUBSIDIZATION OF OPEN BORDERS).	Major new policy language. The agreement now expressly incorporates current Administration priorities.
Nondiscrimination	Section 7.16 was essentially a list of the federal nondiscrimination statutes recipients must follow.	New Section 7.16(b) now states that a CDFI must not, “to the best of its knowledge and after reasonable diligence, provide any financial product or financial service in a manner that violates applicable Federal anti-discrimination laws, including a Certified CDFI providing employment or financial preferences or set-asides based on any person’s race, ethnicity, or sex, in a manner that is inconsistent with any applicable Federal anti-discrimination laws.” CDFIs must maintain compliance policies/procedures and attest annually.	Expanded compliance requirement.

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Fraud/waste/abuse	Section 5.2 required recipients to report suspected fraud, waste, or abuse to Treasury's Office of Inspector General.	Section 5.2 has been expanded substantially, referencing the March 16, 2026 Task Force to Eliminate Fraud , coordination with DOJ and other agencies, and "maximum enforcement response," including award termination/repayment, suspension/debarment, and civil or criminal referrals.	New language.
Healthy Foods definition, terminology	Used the phrase "Food Deserts." Based on the 2015-2020 Dietary Guidelines; emphasized whole foods, added sugar, and sodium.	Replaced "Food Deserts" with "Low-Income Low-Access Food Areas." Now tied explicitly to EO 14212, the Make America Healthy Again Commission , and the updated 2020-2025 Guidelines. Adds references to artificial food dyes, chemical additives, pesticides and ultra-processed foods.	
HFFI geography data	Could use 2015 and 2010 Food Access Research Atlas data.	Requires use of the 2019 "Low Income & Low Access" data (also from the Food Access Research Atlas).	Updated year