



DCUC
DEFENSE CREDIT UNION COUNCIL

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Jason Stverak
Chief Advocacy Officer

April 9, 2026

The Honorable Scott Bessent
Secretary of the Treasury
1500 Pennsylvania Avenue, NW
Washington, DC 20220

Dear Secretary Bessent:

On behalf of the Defense Credit Union Council (DCUC), I write in response to the Department's April 9, 2026 announcement that the CDFI Fund will issue rules concerning the treatment of CDFI Fund awards under the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), and that Treasury is updating relevant CDFI Fund agreements to strengthen compliance expectations tied to federal anti-discrimination laws.

DCUC supports program integrity and lawful stewardship of taxpayer dollars. CDFI-certified credit unions share that commitment, and we are prepared to work constructively with Treasury to ensure the forthcoming notice of proposed rulemaking and related implementation guidance are clear, administrable, and aligned with the operational realities of regulated financial institutions.

As I stated today, **“We can protect program integrity and preserve mission impact, but only if Treasury works with CDFI credit unions on practical rules and releases approved funds promptly once closing and payment conditions are met.”**

To support effective implementation, DCUC respectfully requests Treasury's engagement with CDFI-certified credit unions on five critical areas.

First, clarity on scope and definitions. Credit unions need unambiguous guidance on which CDFI award-related activities Treasury intends to treat as covered “federal public benefits” and how PRWORA restrictions are expected to apply in the CDFI context. Clear definitions, illustrative examples, and uniform standards are essential to support consistent compliance and to avoid unintended disruption in the delivery of lawful financial products.

Second, workable verification expectations. If Treasury expects any verification or documentation practices related to eligibility restrictions, the NPRM and subsequent guidance should specify what is required, who is responsible, and what constitutes a reasonable compliance standard for regulated financial institutions.

Third, safe harbors and transition timelines. Given the seriousness of potential remedies associated with CDFI Fund agreements, DCUC urges Treasury to incorporate safe harbors

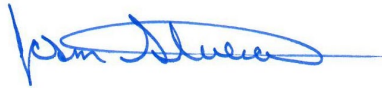
for good-faith compliance and reasonable transition periods, including clear effective dates and an opportunity to remediate technical or inadvertent issues before severe sanctions are pursued.

Fourth, alignment with existing federal anti-discrimination frameworks. Credit unions already operate within established federal fair-lending and nondiscrimination regimes. Treasury's updated agreement provisions should be designed to reinforce compliance with existing federal law while avoiding conflicting or duplicative requirements. Treasury should also provide examples that distinguish prohibited practices from lawful, regulator-recognized tools, so institutions are not discouraged from permissible, mission-focused lending programs that comply with federal law.

Fifth, prompt release of approved CDFI funds. Where awards have been approved and recipients have met applicable closing and payment requirements, DCUC urges Treasury and the CDFI Fund to ensure funds are disbursed promptly. Delays can disrupt loan pipelines, capital planning, and community investments—particularly in the underserved communities many CDFI-certified credit unions are chartered and structured to serve.

DCUC welcomes the opportunity to meet with you, your policy staff, and the CDFI Fund team to discuss implementation details, compliance design, and clear guidance that protects program integrity while preserving community impact.

Sincerely,



Jason Stverak
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DCUC