



Guide Update 23-21: Blocked Person Compliance

Effective: 09/25/23

Retired: 05/16/24

Summary of Changes

HIGHLIGHTS

Effective for all Mortgage Loans as of September 25, 2023, clarifying updates were made to the identification and reporting requirements in:

- Part I, Chapter 3: Borrower, Guarantor, Key Principals, and Principals, Section 308: Compliance; and
- Part V, Chapter 5: Surveillance, Section 505: Compliance.

Primary Changes

- Added a new definition for "Blocked Person".
- Before Delivery and monthly thereafter, you must:
 - confirm every Borrower, Key Principal, Principal, and Guarantor is not a Blocked Person;
 - report any Blocked Person to Lender Risk Management within 24 hours; and
 - comply with all related processes and documentation requirements.

Questions

If you have questions, please contact:

- the Fannie Mae Deal Team; or
- Lender Risk Management, at lender_risk_management@fanniemae.com.