



# 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](mailto:lender_risk_management@fanniemae.com).