

Document Custodian Notice RDC-2023-01

January 9, 2023

Summary

The Document Custodian Notice includes the following topics:

- Independent Audit Requirements for Document Custodians (IARDC)
- Update to Requirements for Document Custodian (RDC) Section 9.2.2 - eNotes Delivered Subject to A Security Interest

Independent Audit Requirements for Document Custodians (IARDC)

Fannie Mae has published the Independent Audit Requirements for Document Custodians for January – December 2023. Please note that the updated requirements replace the requirements version dated January 2022. Document Custodians must verify all requirements are addressed in the auditor’s report before submitting to Fannie Mae.

Effective Date

The Independent Audit Requirements for Document Custodians is effective for AUP Audits conducted from January 2023 and forward (with AUP Audit due date cycle of July 2023 and forward).

Update to Requirements for Document Custodians (RDC) Section 9.2.2 – eNotes Delivered Subject to A Security Interest – Update to “Note” Section only

Current Verbiage:

Note: In addition to the above methods of reflecting a security interest, a third-party security interest may also be shown in the submission of a Fannie Mae Form 2004a. For loans delivered with a Form 2004A, the “Bailee Letter Name” field in the Loan Data should be replaced with a separate “2004A Name” field in the Loan Data. In this situation, the Document Custodian would disregard the Bailee name in the eVault and instead compare the “2004A Name” field in the Loan Data to the depository institution listed on Form 2004A (consistent with the process for paper Notes).

Updated Verbiage:

Note: In addition to the above methods of reflecting a security interest, a third-party security interest may also be shown in the submission of a Fannie Mae Form 2004A. For eNotes delivered with a Form 2004A, in addition to performing the above steps, the document custodian must also compare the “2004A Name” field in the Loan Data to the depository institution listed on Form 2004A to ensure the names match (consistent with the process for paper Notes).

Effective Date

The updated requirement to RDC Section 9.2.2 – eNotes Delivered Subject to A Security Interest is effective 1/1/2023.

For any questions regarding this Document Custodian notice, please contact Fannie Mae at custodian_oversight@fanniemae.com.

Anita Cooper

Lead Associate, Fannie Mae