

# Document Custodian Notice RDC-2025-02

September 2, 2025

## Summary

This Document Custodian Notice includes the following topics:

- **Introduction of Fannie Mae Information Security and Business Resiliency Supplement to Requirements for Document Custodians (RDC)**
- **Additional Updates to Requirements for Document Custodians (RDC) – Dated August 2025**
- **Updates to Document Certification Job Aid – Dated August 2025**

## Requirement: Compliance with Information Security and Business Resiliency Supplement

To enhance the protection of Confidential Information, facilitate resiliency for business-critical activities and support compliance with industry regulations and best practices, Fannie Mae has introduced new cybersecurity and business resiliency requirements for Document Custodians in three key areas:

- Information Security,
- Incident Management, and
- Business Resiliency

These requirements are part of a new ***Fannie Mae Information Security and Business Resiliency Supplement*** (“**Supplement**”), which is incorporated by reference into the RDC.

The RDC document has been updated to include references to these changes, which are detailed in the Supplement. Also, the Supplement has been updated to apply to and require adherence from Document Custodians. While we are providing advance notice of the application of the Supplement to Document Custodians through this Document Custodian Notice, please note the Supplement is not effective to Document Custodians until **April 1, 2026**. **As such, all Document Custodians must be fully compliant with the Supplement by April 1, 2026.**

For additional details about these requirements, refer to the Supplement information webpage [\[link to Supplement here\]](#), which addresses frequently asked questions about implementation, timelines and compliance.

## Additional Updates to Requirements for Document Custodians (RDC)

The annual review of the RDC has been completed and has been updated to incorporate changes, including those previously communicated via Document Custodian Notices published since the RDC dated April 2023. See ‘Document Revision History’ within the RDC for details.

**These additional changes to the RDC (that do not relate to the Supplement) are effective as of the Effective Date indicated in this Document Custodian Notice (i.e. immediately).**



## Document Custodian Certification Job Aid

The annual review of the Document Custodian Certification Job Aid has been completed and has been updated to incorporate document certification changes, including those previously communicated via Document Custodian Notices published since the Document Custodian Certification Job Aid dated April 2022. See 'Document Revision History' within the Job Aid for details.

### Effective Date

Effective immediately.

For any questions regarding this Document Custodian notice, please contact Fannie Mae at [custodian\\_oversight@fanniemae.com](mailto:custodian_oversight@fanniemae.com).

Custody Operations Team