

Concentrated Risk

- Increased size of principal balances, recurring approvals and limited staff induced proposed changes to process
- Suggested Changes might include:
 - Increase size of application threshold to \$500M
 - Increase length of approval to two years (from one)
 - May require additional review/approvals as loan balances increase

Foreign Nationals

- Section 8.2 of the MAP Guide
 - At least one principal with operational decision making authority must be a US Citizen, or a foreign national lawfully residing in the US
- Domestic Principal
 - US citizen with operational control – assets and net worth commensurate with planned project
- Active or Passive Principal (same determination for foreign nationals as domestic principals)

Foreign Nationals

- Active Principal - require SSN, eligible immigration status
 - No SSN, cannot be an Active Principal
- Passive Principal - no SSN as no 2530 filing required
 - ITIN's cannot be used in place of an SSN

Foreign Nationals

- If passive, must disclose identification of individual
 - Required for OFAC search
 - Lender must certify that org docs confirm passive role
 - Passive investor (or entity) must certify that interest is passive