

Information Notice

FINRA Entitlement User Account Certification

Executive Summary

FINRA is introducing a mandatory annual online certification process for the FINRA Entitlement Program. Super Account Administrators (SAAs) for organizations¹ with more than one user must certify that users are entitled only to those applications and privileges necessary to perform their job responsibilities. During the fourth quarter of each year, beginning this year, FINRA will designate a 30-day period during which SAAs must review their organizations' user accounts and complete the certification.

Questions concerning this *Notice* should be directed to Mary Ann Shaw, Senior Director, Information Operations, at (240) 386-4806.

Questions regarding the SAA or Entitlement Program should be directed to the Gateway Call Center at (301) 869-6699.

Background and Discussion

This certification process is part of FINRA's ongoing efforts to protect the integrity and confidentiality of regulatory, proprietary and personal information maintained by FINRA. Additionally, the certification requirement supports each organization's compliance with the management of authorized user accounts on FINRA systems.²

SAAs are responsible for ensuring that users in their organizations who, in order to perform their job responsibilities, require access to applications in the FINRA Entitlement Program—and the sensitive data that those applications may contain—are properly entitled to those applications.

The certification process requires SAAs of organizations that have more than one user to review their user accounts to verify that the individuals are entitled to only the applications, and privileges within those applications, necessary to perform their current job responsibilities. FINRA will contact SAAs in November 2011 to inform them that the 30-day certification period has begun and will provide detailed instructions for completing the certification process.

October 28, 2011

Suggested Routing

- Compliance
- Legal
- Operations
- Registration
- Senior Management

Key Topics

- Entitlement Program

Referenced Notices

- Information Notice 3/24/2010

During this 30-day certification period, SAAs must review their organizations' user accounts to determine that:

- ▶ each user has a continuing need to access FINRA application(s) on the organization's behalf;
- ▶ each user is entitled only to the applications and privileges needed to perform current job responsibilities; and
- ▶ only users who require access to sensitive data (*e.g.*, Criminal History Record Information, Social Security or tax identification numbers, dates of birth) are entitled to access this type of data.

If an SAA does not complete the online certification within the designated 30-day period, FINRA will disable the capability to create, edit and clone accounts for all administrators at the organization until the SAA completes the certification process, and will contact the organization.

While the mandatory online certification is performed once a year, organizations are encouraged to review their user accounts more frequently based upon factors such as company size, number of FINRA-entitled systems and staff turnover.

For additional details, see the [FINRA Entitlement Program – Super Account Administrator](#) page and [FINRA Entitlement User Accounts Certification Process FAQ](#).

Endnotes

1. For purposes of this *Notice*, "organization" refers to any FINRA Entitlement Program participant, including FINRA member firms and regulators.
2. Refer to the [FINRA Entitlement Program Agreement and Terms of Use](#) for complete information.