



FINRA Entitlement User Accounts Certification Process

Frequently Asked Questions (as of 10/28/11)

Q1: What is the FINRA Entitlement User Accounts Certification Process?

A: FINRA established the FINRA Entitlement User Accounts Certification Process as part of its 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 users on FINRA systems. The process provides a formal review of all user accounts in the FINRA Entitlement Program administered by a Super Account Administrator (SAA). The review is conducted by an SAA,

Q2: How frequently will the FINRA Entitlement User Accounts Certification Process be conducted?

A: Certification will be conducted annually in the fourth quarter of each year.

Q3: Can an organization's Administrators review users' access at any time during the year or are user access reviews limited to only during the annual Certification Period?

A: Administrators may review their users' access at any time and FINRA strongly recommends Administrators review user accounts on a regular basis to ensure that accounts remain valid, have proper entitlement, or have been deleted if access is no longer needed. The frequency of access reviews may depend on the size of the organization, staff turn-over, the number of organizational changes, an organization's security guidelines, or other factors that an organization considers in its risk profile.

Q4: Which organizations are exempt from the FINRA Entitlement User Accounts Certification Process?

A: An organization is considered to be exempt when there is only one user at the organization on the start date of the Certification Period.

Q5: If during the Certification Period the number of users at my organization decreases to only one user, will my organization still need to certify?

A: If your organization had more than one user on the start date of the Certification Period, your organization should still certify regardless of the changes made to the user population during the Certification Period.

Q6: How long is the FINRA Entitlement User Accounts Certification Period?

A: The Certification Period is 30 calendar days.

Q7: Who at my organization is responsible for completing the Certification Process?

A: The SAA is responsible for ensuring that the Certification Process is completed by the due date.

Q8: What if my SAA is unavailable during the annual Certification Period?

A: FINRA encourages your organization to replace your current SAA with a replacement SAA to complete the Certification Process.

Q9: How will an organization be alerted to begin the Certification Process?

A: The organization's SAA and Executive Representative will receive the following emails alerting him/her during the Certification Process:

- Initial email - The FINRA Entitlement User Accounts Certification Period is underway with start date and due date defined.
- Reminder email - If certification is not completed ten days prior to due date.
- Past Due email - If certification is not completed by the 30th day.

Q10: When will an SAA be able to begin the Certification Process?

A: FINRA's Entitlement User Accounts Certification Process is scheduled to begin in November. SAAs will be notified via email on the first day when the annual Certification Process can begin. SAAs cannot begin the Certification Process prior to the notification email.

Q11: How does the SAA begin the FINRA Entitlement User Accounts Certification Process?

A: Detailed instructions on how to begin the Certification Process will be included in the FINRA Entitlement User Accounts Certification email messages and on the Account Management Home page.

Q12: How will FINRA communicate to the SAAs during the Certification Period?

A: SAAs will receive a series of messages while in the Account Management Tool, that alerts them to the status of the Certification Process:

- Initial Message - The FINRA Entitlement User Accounts Certification Period is underway with start date and due date defined.
- Reminder Message - If certification is not completed ten days prior to due date.
- Past Due Message - If certification is not completed by the 30th day.

- Successfully Completed Message – Alerts the organization that the SAA has successfully completed the Certification Process.

Q13: Once the SAA begins the Certification Process will he/she be able to exit the Account Management Tool and complete the Certification Process at a different time?

A: Yes, an SAA may complete the Certification Process at a different time; however, FINRA recommends that an SAA certify users on the same day the download of user account information is requested to prevent having to perform a subsequent review of users as the entitlement data may have been updated since the download was requested.

Q14: When would the SAA's Account Management Certification messages not appear?

A: The certification messages will not display in the Account Management Tool if your organization is exempt or has completed the Certification Process and the 30 day Certification Period has ended.

Q15: Who is included in the FINRA Entitlement Certification Process?

A: All individuals who have a FINRA Entitlement user account at a non-exempt organization are included in the certification process. An SAA is provided an online list of these individuals.

Q16: How does an SAA get a list of users to review?

A: After clicking the link, the Account Management Search Results page will display a list of your users. Click on each user to review the applications and functions that each account can access. For your convenience, you can download your user account information into a report to send to other individuals within your organization to confirm individuals' appropriate entitlement, including access to applications, privileges and sensitive data.

Q17: In the Download report that list user information, there are some criteria that is offered for selection. Which criteria should be selected for the download report in order to conduct the review of user accounts?

A: The download report will automatically include the required criteria of user ID and permissions for each user account. Depending on the size of an organization, an SAA may find it helpful to include the first and last names of individuals, especially if the report will be sent to others in the organization to facilitate the review. FINRA recommends that Email be selected as an option as email addresses may change. If individuals are assigned OSO numbers, then an SAA should select the OSO option to confirm this information. Other criteria may be selected based on an organization's decision to validate this information.

Q18: Is an SAA considered a user?

A: Yes, an SAA is considered a user of the FINRA Entitlement Program, with access to account management functionality, and possibly other applications.

Q19: What criteria should my organization use when reviewing our users?

A: You will need to review your organization's 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

Q20: Can my firm still certify after the 30-day Certification Period?

A: Yes, so that your organization can comply and full entitlement functionality may be restored to your administrators, your organization's SAA may complete the Certification Process after the 30 days.

Q21: What are the consequences if my organization does not complete the Certification Process by the due date?

A: The capability to create, edit and clone accounts will be disabled and will remain disabled for **all** Administrators (SAAs & Account Administrators) until your organization's SAA completes the Certification Process. Other consequences may result including notification to the appropriate FINRA district office for FINRA member firms or notifications to other regulators for non-FINRA organizations.

Q22: Can an Administrator (SAA & Account Administrator) delete, or disable user accounts or reset passwords if the organization has not certified within the 30-day period and their capability to create, edit and clone accounts has been disabled?

A: Yes, for security purposes, Administrators may continue to delete or disable user accounts and reset passwords.

Q23: If my organization has questions, who should we contact?

A: Broker/Dealers should contact the Gateway Call Center at (301) 869-6699
Investment Advisers should contact the IARD Call Center at (240) 386-4848