FINRA Form NMA
Frequently Asked Questions

Table of Contents

1.0 The Application Process.....1
2.0 Determining the Application Fee.....3
3.0 Funding the Application.....4
3.5 Filing the Hardcopy Documents 5
4.0 Entitlement Issues: Accessing the Gateway, CRD and Form NMA 5
5.0 Form NMA.....7

1.0 The Application Process

Q. Who should I contact with questions concerning the Form NMA?

A. For substantive inquiries regarding information required in a Form NMA, those questions should be directed to the MAP Group, located in FINRA's New York District Office, at (212) 858-4000, option 5 – Membership Applications.

For questions concerning technology issues, including difficulties accessing the Form NMA, contact the Gateway Call Center at 301-869-6699.

Q. I'm not familiar with the application process. What do I need to do to get started?

A.
1. Apply for and obtain approval of the applicant's name.
2. Review Regulatory Notice 12-32 to determine the application fee.
3. Fund the applicant's general account.
4. Complete and submit required hardcopy forms to FINRA: Form BD, Super Account Administrator Entitlement Form, Email Notification Contact Form, and New Assessment Report.
5. Upon receipt of FINRA Entitlement user ID and password, review the Membership Application section of the Firm Gateway.
6. Access Forms and Filing section of the Firm Gateway and complete and submit Forms U4 and BR.
7. Access Forms and Filing section of the Firm Gateway and complete and submit Form NMA and attach the NMA Application Fee Computation Worksheet.

Q. When does the 180-day new member application review period begin? With the filing of Form BD or Form NMA?

A. The 180-day period starts on the date an applicant submits a substantially complete Form NMA. FINRA Rule 1012(a)(4)(E) states: "Filing by an electronic system shall be deemed

complete on the date specified on the confirmation page generated by the electronic filing system."

Q. I understand that once I initiate a new Form NMA, if I don't make some entries to that form at least once every 90 days, it will be deleted from the system. If that happens, will my application fee be refunded?

A. No. The application fee will not be refunded. Therefore, applicants are encouraged to carefully research the application process prior to filing and commence the new member application process only when prepared to see the application through to completion. *Note: As an accommodation to prospective applicants, FINRA has extended the 90-day window within which a Form NMA remains active to 120 days. Hence for all NMAs, applicants will be required to update that Form at least once every 120 days. After 120 days, if there have been no updates to the Form NMA, it will be deleted and cannot be restored.*

Q. I understand that applicants are required to provide their Written Supervisory Procedures (WSPs) with their Form NMAs. Additionally, FINRA requests that applicants provide other policies and procedures.

If the applicant has incorporated its procedures into a single, comprehensive WSP document, you indicate that applicants need not attach multiple copies of the same document in response to various questions. Instead, an applicant can attach a statement to those other questions explaining that the requested procedures are included in the applicant's WSPs. Would that statement be entered into a text box, or in an attachment? Also, what should this statement say?

A. The explanation would be provided via an attachment to the question outside of Section VI – Policies and Procedures that is requesting the procedures. The text of the explanation should note that the specific type of procedure requested is encompassed in the applicant's WSPs and must specifically identify where in the WSPs these procedures are located. For example: "The [Name] procedures are contained in the applicant's WSPs at section [number]/Page [number]."

Q. Will the centralized NMA group convey all written Information Requests electronically and will this be by email?

A. Yes. The MAP Group will transmit Information Requests to the applicant contact by email.

Q. Will one analyst be my primary contact on my application?

A. One primary analyst will be assigned to the application. However, to ensure responsiveness and efficiency of the process, other analysts may assist the primary analyst.

Q. Often, the applicant's proposed associated persons are currently employed at member firms and, for a variety of reasons, need to ensure that their employer does not see indications that they are intending to leave. In the past, we've sometimes held off filing

Forms U4 until the Membership Interview. Are we now required to file Forms U4 before we're entitled on Form NMA?
A. The Forms U4 are not required to be filed prior to or concurrent with the filing of Form NMA.

However, in order for FINRA staff to properly review the new member application, the applicant must identify its proposed associated persons. Hence, the Forms U4 of the proposed associated persons should be filed as early as possible in the application process in order to avoid delaying that aspect of the review.

Q. In certain documents, I see references to FINRA departments named "Entitlements" and "Registration and Disclosure." Are these the same department?

A. FINRA Entitlement is a unit within the Registration and Disclosure (RAD) Department.

Q. You mentioned that the 180-day application review period commences upon submission of the Form NMA. The Form NMA Participants' Guide, in Section 2.4 - *Getting Started: Obtaining Approval of the Applicant's Name,* states that an approved firm name will be reserved for 120 days with an option for 60 day extension.

If after the applicant files the Form NMA the application review becomes delayed and the 180-day timeframe (i.e., the initial 120 days plus the 60-day extension) for name reservation expires prior to the 180-day time frame of the application review process (i.e., and FINRA's review of the new member application is still continuing), will the applicant still retain the name or does another extension request showing good cause need to be submitted?

A. The process around the time frames applicable for reserved names still applies. As such, it's probably a good practice to reserve the name shortly before initiating the entitlement process. However, in the event that delays in the new member application review process necessitate an extension of the name reservation, the applicant should immediately contact FINRA's Registration and Disclosure Department to request an extension.

2.0 Determining the Application Fee

Q. How is the application fee determined?

A. As set forth in Regulatory Notice 12-32, and Schedule A, Section 4 of the By-Laws, FINRA has revised the new member application fee structure to implement a fee structure that assesses fees ranging from $7,500 to $55,000 depending on the size of the new member applicant, as outlined in the table below.

Number of Registered Persons Associated with Applicant	Small	Medium	Large
Tier 1	1-10	151-300	501-1,000
Tier 2	11-100	301-500	1,001-5,000
Tier 3	101-150	N/A	>5,000

Application Fee per Tier	Small	Medium	Large
Tier 1	$7,500	$25,000	$35,000
Tier 2	$12,500	$30,000	$45,000
Tier 3	$20,000	N/A	$55,000

In addition, each applicant for membership also will be assessed an additional $5,000 if the applicant will be engaging in any clearing and carrying activity. Applicants must complete and attach to Form NMA the New Member Application Fee Computation Worksheet, found on the FINRA Firm Gateway, when submitting their Form NMA for FINRA review.

3.0 Funding the Application

Q. How do I fund the account with the application fee?

A. The applicant will fund the general account by electronically wiring the fees to the general account set up by FINRA for that purpose, using the instructions below.

Wire Transfer Instructions:
Bank's Name: BNY Mellon Financial Corporation
Address: 500 Ross Street
Pittsburgh PA 15262 - 0001
ABA # 031 0000 37
Swift Code (International) MELNUS3P
Reference Number: [INSERT THE RESERVED FIRM NAME]

Credit Funds to:
Account's Name: FINRA
Rockville MD 20850
Account Number: 8 103 632
Tax ID 52 1959501

Important: *Only the new member application fee and initial funding (*e.g.*, state registration fees, registered person registration fees, examination fees, as appropriate) are to be submitted to the general account. This must be in the form of a single wire; the piecemeal wiring of the application fee and initial funding should be avoided. Processing of the applicant's hardcopy documents (see Section 4.0 below) will not be commenced until the entire application fee is received in the general account. All subsequent funding must be submitted to the applicant's CRD Daily Account.*

Submission of additional funding into the general account instead of the applicant's CRD Daily Account can create processing delays, particularly in processing registrations for an applicant

whose CRD Daily Account is funds deficient. For additional information on funding the applicant's CRD Daily Account, see FINRA's website at Regulatory Systems/CRD/Fees and Accounting at www.finra.org/RegulatorySystems/CRD/FeesandAccounting/p005219.

Q. When the funds are wired into the General Account, how will I know that FINRA has received them?

A. When you wire funds into the General Account, your bank should provide you with a wire confirmation number.

3.5 Filing the Hardcopy Documents

Q. I submitted the completed Form BD to CRD, but did not submit the SAA Entitlement Form because I was waiting for my client, the applicant, to sign them. Is this a problem?

A. The NMA process requires that all the hardcopy documents be submitted together. Submission of these items separately would, if allowed, cause delays in the processing and impair the speed with which entitlement is provided to allow the user to access the Form NMA via the Gateway.

Q. Can the Form BD be completed and submitted electronically?

A. The initial original Form BD must be completed and submitted in hard-copy form along with the SAA Entitlement Form, Email Notification Contact Form; and New Assessment Report. Amendments to the Form BD are to be submitted electronically via the Gateway.

Q. When and how do I submit Forms U4?

A. Applicants are required to submit Forms U4 electronically via CRD through the Gateway once entitlement has been approved. Note that in order to access CRD, the user must be specifically granted those privileges by the administrator for the applicant. See question 1 above for details on the sequence for filing application forms. Further information on the filing requirements of U4 and other Forms is available on the 'Current Uniform Registration Forms for Electronic Filing in Web CRD' page at www.finra.org/RegulatorySystems/CRD/FilingGuidance/p005235.

4.0 Entitlement Issues: Accessing the Firm Gateway, CRD and Form NMA

Q. To whom will FINRA direct the email advising that entitlement has been granted?

A. FINRA will send the email to both the person designated as the Super Account Administrator (SAA), as well as the executive officer who signed the SAA Entitlement Form.
For security reasons, the user ID and password will be sent to the SAA in two separate emails. The SAA will be able to create Account Administrators (AAs) who will then create accounts for other users within the organization.

Q. How will the person receiving the notification of entitlement provide me access to work on the Form NMA?
A. Your organization's administrator will create an account for you and will notify you how to access the Form NMA.

Q. Once the applicant files all the hardcopy paperwork (*i.e.*, Form BD, SAA Entitlement Form, Web CRD Notification, New Member Assessment Report), how long does it take to get entitled to Form NMA?

A. Processing of hard-copy paperwork takes approximately seven business days, assuming that all forms are complete and accurate and the applicant's name has been reserved. Applicants are urged to ensure that all forms are complete and accurate, otherwise processing delays may occur. FINRA staff will notify applicant(s) (or their consultants/law firms) of any missing or unclear information on the forms. Prompt attention by the applicant will help expedite FINRA's processing.

Once processing is complete, the FINRA Entitlement Group notifies the applicant's Super Account Administrator via email that access has been granted and provides the Super Account Administrator with a user ID and password. Accounts can be created to provide access to Form NMA to the appropriate individuals. An entitled individual can immediately access and begin updating the Form NMA.

Q. Is the electronic filing system available after-hours and on weekends?

A. The electronic filing system is available and supported from 8 a.m. Eastern Time (ET) to 8 p.m. ET. It is accessible after-hours and on weekends, but technical support is not available during that time.

Q. I have lost my password and I can't get into the Firm Gateway. What should I do?

A. Contact the Entitlements team via the Membership Gateway Call Center at (301) 869-6699 and request a new password.

Q. I can access the Form NMA without a problem, but when I try to get into CRD to submit U4s, the CRD system is not allowing me access. Why is that?

A. You need to ensure that the entitlements that were selected for you include access to CRD, because if they do not, you will be unable to access CRD. To obtain CRD access, contact your administrator. FINRA recommends that in setting up entitlements, Web CRD entitlement privileges and Form NMA entitlement privileges reside with the same person as this will ensure that this individual can access both applications to create and submit all necessary filings during the NMA process. More coordination will be necessary if Account Administrator responsibilities for Web CRD and the Form NMA are assigned to different persons.

Q. I've just entered the Firm Gateway and attempted to access the Form NMA, but I get a blank page. What should I do?

A. The issue here is typically one where the user has not been granted entitlements to the Form NMA. Applicants are reminded to ensure that the appropriate persons are identified on the Entitlements forms.

Q. Do entitlements expire?
A. Per FINRA's Corporate Security Policy, a user account with access to any of the applications offered by the FINRA Entitlement Program that has not been accessed at least once during a consecutive 13-month period following a password change, will be considered a "dormant" account and will be automatically deleted. If this should occur, a Super Account Administrator would need to recreate the Account Administrator's account and the Account Administrator will need to recreate a user account if the user again needs access to any of these applications.

If a Super Account Administrator's account is deleted, a new SAA Entitlement Form would need to be submitted to FINRA to recreate the SAA account.

Q. I submitted Form BD, SAA Entitlement Form, Email Notification Contact Form; and New Assessment Report some time ago and still have not received notification that entitlements have been granted. Who should I call?

A. As mentioned above, processing of the hard-copy forms takes approximately seven business days. If you have not received notification after seven business days, contact the Membership Gateway Call Center at (301) 869-6699. Note that issues have arisen in the past where the person expecting to receive notifications that the entitlements have been granted (*e.g.*, the consultant handling the Form NMA on behalf of the applicant) is not the person who was identified for that purpose on the Entitlements forms. Applicants are encouraged to ensure that the appropriate person is identified on the SAA Entitlement Form.

5.0 Form NMA

Q. Who should I contact with questions concerning the Form NMA?

A. For substantive inquiries regarding information required in a Form NMA, those questions should be directed to the MAP Group, located in FINRA's New York District Office, at (212) 858-4000, option 5 – Membership Applications.

For questions concerning technology issues, including difficulties accessing the Form NMA, contact the Gateway Call Center at 301-869-6699.

Q. Once I submit the Form BD and other hardcopy documents to CRD, how much time do I have to submit the Form NMA?

A. The Form NMA must be submitted promptly once entitlement has been granted. Note that the application is not deemed to be filed until the substantially complete Form NMA has been submitted.

Q. I've started a Form NMA and have saved it so I can gather some additional documents. How long will a Form NMA stay active once I've saved it?

A. Users are encouraged to promptly complete the Form NMA once they commence the form.

However, once you commence a Form NMA and save it, you must access and work on that Form NMA within 120 days otherwise it will be de-activated by the Electronic Filing System and the user will be required to begin a new Form NMA.

Q. For my applicant, the FinOp will be registered with multiple firms. I need to attach the notification to the other employing firms pursuant to Rule 3270, but there does not appear to be a place for this in the Form NMA. Where should I attach this information?

A. For the FinOp and any other part-time personnel, in Section III. Personnel, question C.5 must be completed. This question asks: "Will this Associated Person be employed by other entities or by employed part time at the Applicant." Answering this question 'Yes' will ensure that the Part Time page is presented for completion. In Section III. Personnel – Attachments, the Rule 3030 attachment can be included as an attachment to Question 6a.

Q. The applicant's proposed business is one that does not require securities clearance and settlement arrangements. How do I complete Section I.B-Securities Clearance and Settlement in the Form NMA?

A. In response to question I.B.1, select "Other" and insert a very brief explanation in the box provided *and* in response to III.B.3.h, attach a detailed explanation concerning why the applicant's proposed business model does not require a clearing arrangement.

Q. Are the documents to be uploaded into the Form NMA required to be in a certain format?

A. Permissible upload formats are: Portable Document Format (.pdf), Microsoft Word (.doc), Microsoft Excel (.xls), Microsoft PowerPoint (.ppt), rich text format (.rtf) and text format (.txt).

Q. I want to use the .pdf form as a working draft of my application. Can I download the Form and fill it out, then use that as a guide when I complete the Form NMA on Firm Gateway?

A. The .pdf of the Form NMA provided on the "How to Become a Member" page is made available as a guide to applicants in filling out the online Form NMA. Applicants can use that .pdf of the Form NMA for general orientation and to gain an understanding of the contents of the Form. However, in order to access, complete and submit the Form NMA, applicants must first go through the new entitlement process, and use the electronic version of the Form NMA provided on the Firm Gateway. Note also that the .pdf displays all business lines and all questions whereas the electronic Form NMA provided in the Firm Gateway will reflect only those business lines the applicant has selected on Form BD. PDF of Form NMA:
www.finra.org/BecomeAMember/SampleNMA

Q. If I enter an individual's CRD number into Form NMA, will that result in a change to their CRD record, or in a notification to their current employer?

A. No notification to a current employer will take place as a result of entering registered personnel information into Form NMA. Form NMA is able to retrieve information on registered individuals from FINRA's databases using the individuals' CRD numbers. When this retrieval occurs, there is no direct interaction between Form NMA and the CRD system and consequently no changes to CRD, or notifications to other current employers of such changes in CRD, can be effected by the Form NMA.

Q. When I amend Form NMA, will the information I entered in the rest of the form be deleted?

As a general matter, when information is added to or deleted from the Form NMA, previously entered information in other parts of the form will not be altered. The exceptions to this are those questions where the responses provided to them determine other aspects of the application.
For instance, if the applicant initially indicated in Section I – General Information that it will not receive funds or securities and will clear transactions on a fully disclosed basis, the required net capital derived in Section IV.A.1for this applicant would initially reflect the $5,000 statutory minimum. However, if the applicant later amended Form NMA to indicate that it would instead self-clear the transactions, then Section IV.A.1 would be automatically modified to reflect the $250,000 minimum statutory requirement. Other than these types of logical connections, however, changes to one part of Form NMA will not delete or otherwise alter information entered into another part of the NMA.

Q. Has FINRA developed guidelines for naming .pdf and other attachments to the Form NMA?

A. The technology that supports the Form NMA automatically attaches an identifier, known as "metadata" to each attached file. This metadata automatically indicates the name of the applicant, the CRD number, the date, and the type of document, based on where the document is attached on the Form NMA. Also, the system automatically attaches a version number to each amended document submitted by the applicant. As such, the applicant may name documents as best serves their purposes for organizing them. However, it is recommended that attachment filenames should allow the user to easily intuit the type of document attached.

Q. Should the electronic documents I attach to Form NMA be submitted as .pdf files? How will FINRA ensure the documents I attach are not modified after submission?

A. There is no requirement to submit the documents in .pdf format, although all attachments to Form NMA are required to be made electronically. The Form NMA will accept Portable Document Format (.pdf), Microsoft Word (.doc), Microsoft Excel (.xls), Microsoft PowerPoint (.ppt), rich text format (.rtf) and text format (.txt). Also, documents submitted through the Form NMA are presented as "read only" to FINRA staff, so they are secure from any accidental modification.

Note: Always be cautious when converting documents to .pdf so that you do not "scan the documents as images." This will create a large file that could take a long time to upload to the Form NMA.

Q. I noticed that the entire right side of the first page of Section VI – Policies and Procedures where the user would enter the page numbers of the Business Continuity Plan appears to be cut off and, as a result, I cannot enter the page numbers or perform other functions on that page such as "Save" or "Continue." Please let me know how best to proceed on this page.

A. There is a scroll bar at the bottom of the Form NMA page that addresses this issue.

Q. Section V. A – Fidelity Bond Coverage of the Form NMA requires that the applicant attach a copy of the proposed SIPC-3 – Certification of Exclusion from Membership that the applicant proposes to file with SIPC in the event FINRA approves the application. The applicant's proposed activities would make it eligible for exemption from SIPC registration. However, I will be unable to obtain this form in advance. Will this prevent me from filing the Form NMA?

A. No. Since the SIPC-3 – Certification of Exclusion from Membership form is not marked with a red asterisk (*i.e.*, it is not a mandatory form), you will be able to submit the Form NMA without it.