



## 2019 ARM Educational Conference

**FINRA** 

**Registration & Disclosure Systems and Policy Updates** 

Amelia Island, FL 03/05/2019

## Agenda



- Registration Category and Exchange Updates
- 2019 Registration System Roadmap
- New CRD Features
- Training Opportunities
- Enhanced Public Record Review
- Potential Changes to 4530 Quarterly Reporting
- Proposed Revisions Forms U4 & U5 Update



# Registration Category and Exchange Updates



## **SRO Registration Category Changes**

- In connection with the October 1, 2018 representative-level exam restructuring, Section 4 of Form U4 was reformatted to make selecting SRO registration categories more intuitive.
- Section 4 is now divided into the following three sub-groups:
  - 1. Representative-Level Registration Categories
    - a) Including retired representative registrations
  - 2. Principal-Level Registration Categories
    - a) Including retired principal-level registrations
  - 3. Exchange-Specific Registration Categories
    - a) Registrations not recognized by FINRA
- Other SROs have also made changes to the registration categories that they recognize.
  - (See sample screenshots on the following slides...)



### Registered representative registration categories:

REPRESENTATIVE LEVEL REGISTRATION CATEGORIES																						
REGISTRATION CATEGORIES	FINRA	NYSE							CBOE BZX	CBOE EDGA	CBOE EDGX	XÕN	ВХ	ISE	ISE GEMX	ISE MRX	PHLX	MIAX Emerald	MIAX Options	MIAX PEARL	вох	IEX
IR - Investment Company and Variable Contracts Products Rep. (S6TO)																						
GS - Full Registration/General Securities Representative (S7TO)																						
DR - Direct Participation Program Representative (S22TO)																						
MR - Municipal Securities Representative (S52TO)																						
TD - Securities Trader (S57TO)																						
IB - Investment Banking Representative (S79TO)																						
PR - Limited Representative - Private Securities Offerings (S82TO)																						
RS - Research Analyst (S86 and S87)																						
OS - Operations Professional (S99TO)																						
Other (Paper Form Only)																						
RETIRED REGISTRATION CATEGORIES																						
AR - Assistant Representative/Order Processing																						
CD - Canada-Limited General Securities Registered Representative																						
CN - Canada-Limited General Securities Registered Representative																						
CS - Corporate Securities Representative																						
FA - Foreign Associate																						
IE - United Kingdom - Limited General Securities Registered Representative																						
OR - Options Representative																						
RG - Government Securities Representative																						

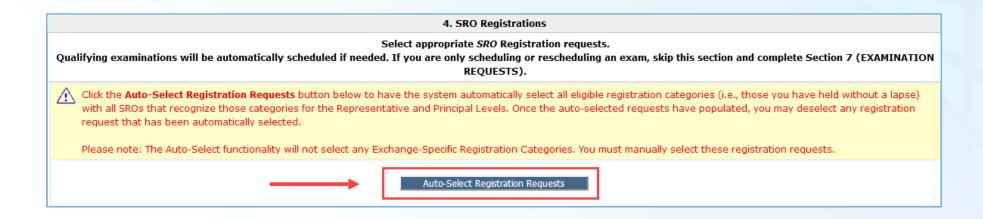


#### OPrincipal registration categories:

PRINCIPAL LE	VEL R	EGIS	STR/	ATIC	N C	ATE	GOR	IES															
REGISTRATION CATEGORIES	FINRA	NYSE	NYSE-AMER	NYSE-ARCA	NYSE-CHI	NYSE-NAT	CBOE	CBOE C2	CBOE BYX	CBOE BZX	CBOE EDGA	CBOE EDGX	NQX	ВХ	ISE	ISE GEMX	ISE MRX	PHLX	MIAX Emerald	MIAX Options	MIAX PEARL	вох	IEX
OP - Registered Options Principal (S4)																							
SU - General Securities Sales Supervisor (S9 and S10)																							
CO - Compliance Official (S14)																							
CR - Compliance Officer (S14)																							
SA - Supervisory Analyst (S16)																							
GP - General Securities Principal (S24)																							
RP - Research Principal (S24)																							
BP - Investment Banking Principal (S24)																							
TP - Securities Trader Principal (S24)																							
PO - Private Securities Offerings Principal (S24)																							
IP - Investment Company and Variable Contracts Products Principal (S26)																							
FN - Financial and Operations Principal (S27)																							
FI - Introducing Broker-Dealer/Financial and Operations Principal (S28)																							
DP - Direct Participation Program Principal (S39)																							
FP - Municipal Fund (S51)																							
MP - Municipal Securities Principal (S53)																							
PG - Government Securities Principal																							
Other (Paper Form Only)																							
RETIRED REGISTRATION CATEGORIES																							
SM - Securities Manager																							



 Online Form U4 filers will have the option to have Web CRD auto-select registration categories based on the registrations the individual has held during their continuous registration period.



- Since October 1, 2018, the Auto-Select feature has been selected 27,255 times.
- The auto-select feature does not apply to filings uploaded via Web EFT.



 Registration categories not recognized by FINRA now have their own section on the form, and are not available for auto-selection.

EXCHANGE-SPECIFIC REGISTRATION CATEGORIES																							
The Auto-Select functionality will not select any Exchange-Specific Registration	n Ca	tegori	es. Y	′ou i	must	t ma	nua	Ily se	elect	thes	se re	egisti	ration	n req	quest	s.							
REGISTRATION CATEGORIES	FINRA	NYSE	NYSE-AMER	NTSE-ARCA	NYSE-CHI	NYSE-NAT	CBOE	CBOE C2	CBOE BYX	CBOE BZX	CBOE EDGA	CBOE EDGX	NQX	ВХ	ISE	ISE GEMX	ISE MRX	PHLX	MIAX Emerald	MIAX Options	MIAX PEARL	вох	IEX
AP - Approved Person																							
CF - Compliance Official Specialist																							
FE - Floor Employee																							
LE - Securities Lending Representative																							
LS - Securities Lending Supervisor																							
ME - Member Exchange																							
MT - Market Maker Authorized Trader-Equities																							
OM - Options Member (S57TO)																							
CT - Securities Trader Compliance Officer (S14)																							
FL - Floor Clerk - Equities (S19)																							

## **SRO Updates**



SRO	Description of Activity	Effective Date	CRD Go-Live Date
CHX	Change SRO name to "NYSE Chicago, Inc" and the acronym to "NYSE-CHI".  Added the CR, MT and SU registration categories.	February 15, 2019	February 23, 2019
MIAX EMERALD		March 1, 2019	March 1, 2019



# 2019 Registration System Roadmap

## 2019 Registration System Roadmap



Q1 2019

#### FinPro (January 11, 2019)

• Implemented onetime passcode for identity verification

#### New CRD (January 26, 2019)

 Introduced ability for firms to query and view individual information via new **CRD** 

#### **Entitlement Platform** Migration (February 2, 2019)

 Replaced login platform and implemented security enhancements

#### Web CRD, IARD & PFRD Release 2019.02 (February 23, 2019)

- CHX renamed to NYSF-CHI
- New MIAX EMERALD SRO added
- Other enhancements and bug fixes

#### New CRD (March 16, 2019)

 Enhancements to individual query/view for firms

Q2 2019

#### Web CRD, IARD & PFRD Release (TBD)

- State report enhancements
- Move databases to the Cloud
- Other enhancements and bug fixes

#### E-Bill (TBD)

- Migrate all firm CRD accounting reports to E-bill
- Provide regulators with online access to disbursement data

#### **Web EFT Platform** Migration (June 30, 2019)

• Deadline for all subscribing firms to complete migration to fileX



**Registration programs Public Disclosure programs Transformation Initiatives** 

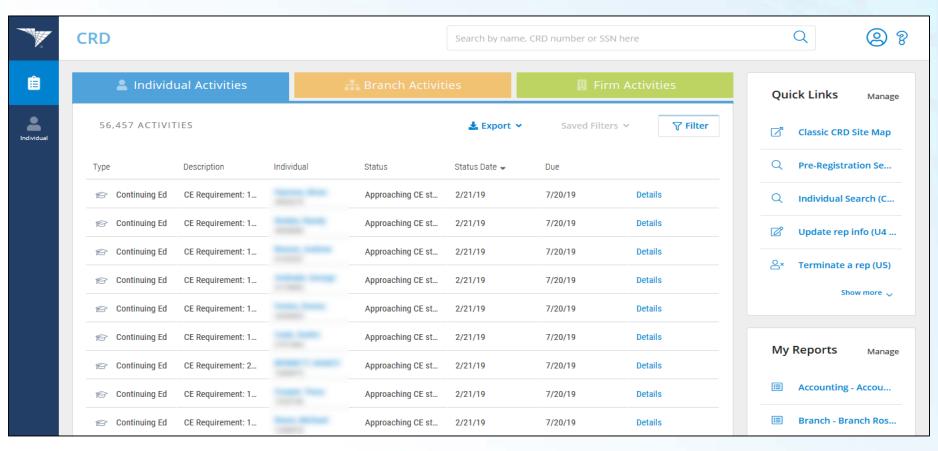


## **New CRD Features**



## New CRD – Launched June 2018

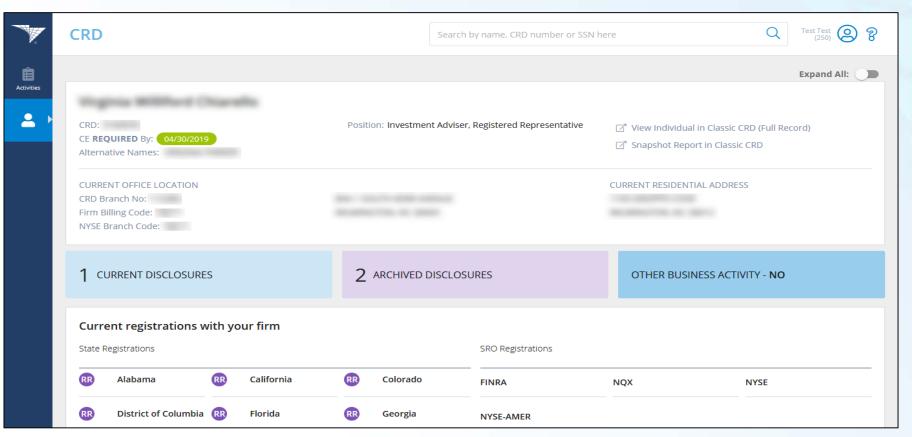
OIN June 2018, the new version of CRD was launched with the Activities List and customizable shortcuts for Quick Links and My Reports.







- Firms are now able to query and view individual information in the new version of CRD.
  - Users with classic "View Individual" access have been automatically entitled.

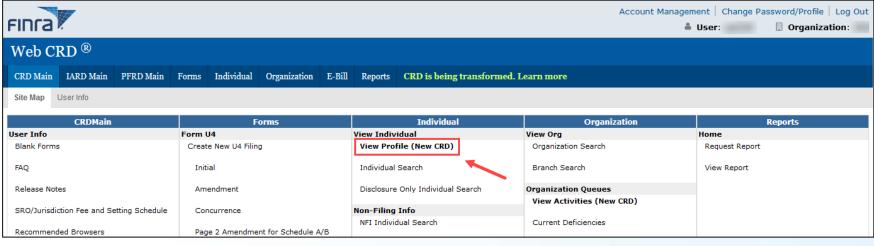






#### OUsers can access the new individual display in two ways:

- Log into the new version of CRD: <a href="https://mycrd.finra.org">https://mycrd.finra.org</a>
- Use the links embedded in Classic CRD:



View Profile in New CRD	<del></del>	Composite Information
Individual CRD#:		Individual Name:
Full Legal Name	Total Services	
Social Security Number	xxx-xx-xxxx View SSN	
Date Of Birth		
Employment	Name	
	Firm Billing Code	
	Position	Investment Adviser Representative / Registered Representative

## New CRD - Individual Query/View (cont.)



#### Upcoming enhancements to individual query and view planned for March 16, 2019:

- Display an indicator if the individual has created an account for the Financial Professional Gateway (FinPro)
- Display an indicator if the individual was previously registered with a firm that was severely disciplined





#### **OFINRA** is finalizing plans to move the registration databases to the Cloud

The migration will occur over 3 weekends in April 2019

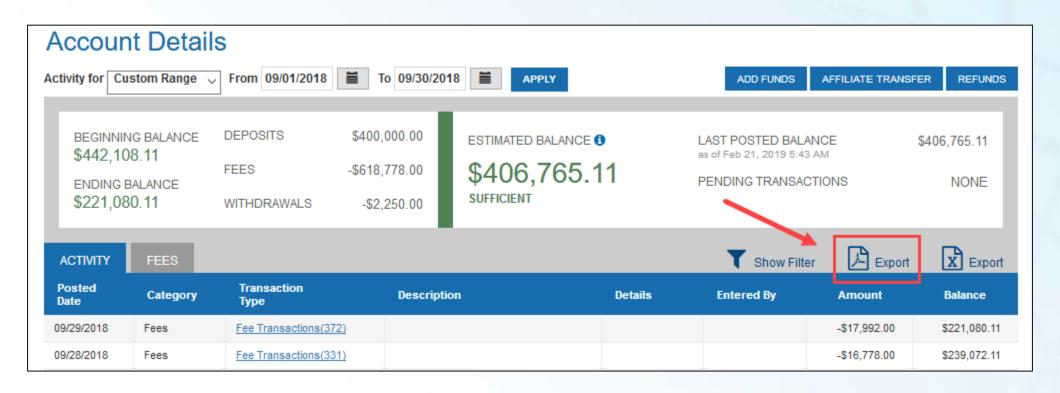
April 2019	Dates	Activities	System Outages							
Weekend 1	4/6 – 4/7/2019	Initial load of cloud databases	CRD, IARD, and IAPD are down							
Weekend 2	4/13/ - 4/14/2019	Data compare and reserve for any issues	CRD, IARD, and IAPD							
Weekend 3	4/19 – 4/21/20019 *4/19 is Good Friday	Complete database move to the Cloud	CRD, IARD and IAPD are down							
Go-Live Sund	Go-Live Sunday, April 21, 2019 - Complete database migration to the Cloud									

Complete database migration to the Cloud





#### The existing CRD/IARD 'Accounting – Account Activity – Firms' PDF report will be accessible via E-Bill.



## Web EFT Migration to fileX



#### O What is fileX?

• A replacement for the current file transfer mechanism for Web EFT (FSG).

#### Features

- Multiple user accounts for a single firm.
- New options for programmatic file transfer (SFTP, REST, AWS S3 Direct).
- Consolidated location for all FINRA file transfer needs.

#### Considerations

- No changes to upload XML structure or report content/layout.
- Availability of a dedicated user interface is TBD.

#### Migration Timeline

- Machine-to-machine test environment is currently available.
  - For access, have one of the firm's current EFT contacts send a request to <u>WebEFT.Support@finra.org</u> (please include the firm's CRD number).
- All subscribers migrated to fileX by June 30, 2019.

#### Keeping Track of Updates

 Updates during the migration will be posted to: <u>http://www.finra.org/industry/web-eft/migration-to-filex</u>



## **Training Opportunities**

## **Available Trainings**



#### Foundations of CRD

 This class will cover both classic CRD and new CRD functionality, discussion on Registration and Disclosure hot topics, plus an overview of IARD.

#### **OFINRA Registration and Disclosure Boot Camp**

 This class includes two days of practical and comprehensive training on reporting disclosure-related events and RAD-related hot topics. You will have the opportunity to meet one-on-one with Disclosure Review analysts and other RAD staff.

#### New CRD Webinar

This class will cover the latest functionality for new CRD via live online presentation.

#### Customized Firm Training

 RAD's training team can work with firms to customize in-person or online training sessions to meet their needs. For more information, contact us at <a href="WebCRD@finra.org">WebCRD@finra.org</a>.

### See 2019 schedule on the following slide. To register, please visit:

http://www.finra.org/industry/crd/training-support

## 2019 Training Schedule



Q1 2019

Foundations of CRD (March 7 – 8, Jacksonville FL)

New CRD Webinar (March 27, 2019)

Q2 2019

Foundations of CRD (TBD)

New CRD Webinar (June 26, 2019)

Q3/Q4 2019

Foundations of CRD (September 23 – 24, Rockville MD)

Disclosure Boot Camp (September 25 – 26, Rockville MD)

New CRD Webinar (October 23, 2019)



## Enhanced Public Records Review (PRR)

## Enhanced Public Record Review (PRR) Background FINCA



#### Objective

• FINRA transitioned from annual public record reviews for all registered representatives (RRs) to initiating individual reviews whenever a new Form U4 is submitted (i.e., initial and transfer Forms U4). This new approach benefits the regulatory community, firms and investors, as it eliminates the need to validate this information as required by FINRA Rule 3110(e), and it also improves the quality and timeliness of data available in CRD and BrokerCheck.

#### **2015** to Mid-2018

- RAD conducted annual financial public record reviews. These reviews resulted in thousands of new disclosures being reported on CRD and BrokerCheck; however, the review process was inefficient and took a long time to complete. This resulted in the data becoming stale.
- RAD also conducted criminal public records background checks on RRs who were either fingerprinted more than 5 years ago or who had not had a criminal background check performed within the past 5 years. This process was entirely separate from the annual financial public records review.

## Enhanced Public Record Review (PRR) Background



#### May 18, 2018

PRR Enhancement Information Notice









Annual financial public record reviews

## 2018 Impacts Due to Enhanced PRR Initiative



#### Olnvestor Impacts

 Financial disclosure received as a result of PRR was provided to BrokerCheck considerably faster than in previous years.

#### **OFIRM Impacts**

- Firms received some compliance relief for the Rule 3110(e) background validation obligation.
- Due to more timely notification of outstanding PRR items, firms realized a significant overall reduction in late disclosure fees and compliance related expenses.

#### **OFINRA Impacts**

- More accurate, consistent, and timely regulatory data and intelligence is now available.
- Regular data sharing has led to increased collaboration between departments and better enforcement and uniformity throughout the organization.





New U4s will prompt an immediate financial public records review

Last general annual financial public records review is being

concluded



- All RRs (except those with a European residential address) will be included in financial public records review monitoring
- Annually, RRs with a European residential address will be reviewed for financial public records
- Criminal PRR records will be reviewed annually for any RR for whom the following apply:
  - CRD does not have a fingerprint result in the last 5 years, and
  - criminal PRR has not been conducted in the last 5 years.

## FINCA

## Pending changes to 4530(d) quarterly reporting

#### **OCurrent**

 RAD cross-checks customer complaints reported via 4530(d) with a sales practice violation code and dispute amount either not stated or estimated to be more than \$5,000, against those complaints reported in CRD

If the complaint is not in CRD, RAD sends a letter to the firm to ask for a CRD filing or

reason why it is not reportable

#### Proposed

- 4530(d) reporting system will be updated to so that reporting firm can identify up front whether or not a sales practice related complaint reported in 4530(d):
  - Has been/will be filed in CRD
  - Is not required to be reported in CRD, or
  - CRD filing determination is not yet possible
- This will limit the inquiry letters RAD needs to send to firms namely for those that will be filed in CRD or a determination was not yet made. This will lessen the administrative burden for both FINRA and industry a "win-win."



## Proposed Revisions to Forms U4 & U5 – Update





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## 2019 ARM Educational Conference

FINRA
Registration System Transformation Update

Amelia Island, FL 03/05/2019

#### **Panelists**





**Bill Swanstrom** 

Vice President,
Registration &
Disclosure
Business
Development &
Innovation
(FINRA)



Ivy Ho

Vice President, Industry & Investor Technology (FINRA)



**Noah Egorin** 

Senior Director,
Registration &
Disclosure
Business
Development &
Innovation
(FINRA)



Jennifer DiValerio

Managing Director,
Broker Dealer
Compliance
(Foreside Financial
Group, LLC)

#### **CRD Transformation Vision**



Introduce a modern, cost efficient, financial services registration system that allows FINRA to be responsive to change, support proactive compliance, enable an ecosystem and delight <u>all</u> of its users.

#### **Transformation Themes**



Designed To Get Work Done

Flexible Data Entry Focus on Convenience

Proactive Compliance

One-Stop Shop For Reps Self-Service Reporting

Communication and Collaboration

Better Systems Integration

Increased
Availability and
Supported
Devices

#### **Delivered to Firms**





#### **Activities**

Consolidated view of the classic CRD Queues and provided features to customize and export the lists



#### **FinPro**

Continued expansion of FinPro, including notifying professionals when U5 information is filed and improving the onboarding experience



#### **Individuals**

New interface for querying and viewing information about professionals



#### Customization

Features that empower the user to display items relevant to their role, including activities, reports and quicklinks

## New CRD & FinPro Usage



**New CRD** 

# 2,328 individuals

have used New CRD and represent

# >1/3 of FINRA firms

FinPro

>80,000 professionals registered

2275

**U5 Notifications Sent** 

### **Coming This Year**





### **FinPro**

Enhancements to support firms' and reps' attestation of information in CRD and notification of CE



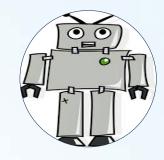
#### **Views**

Further enhancements to how firms view individuals, and new displays and functionality for firms and branch information



### Reporting

Introduction of new functionality to utilize and customize CRD data



### **Automation**

First new CRD APIs to allow for obtaining "real-time" data and supporting firm workflow



### **Core Foundational Services**

Along with the core database moving to the cloud, firm configuration, new audit and notification functionality will be established



### **Regulator Functionality**

New capability for FINRA's disclosure review staff, including automation, workflow and communication features

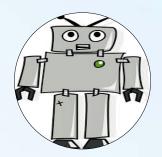
## Under Development but Further Down the Road





### **Enhanced Data Collection**

New experience for collecting required registration information (U4, U5)



### **Automation**

Expansion of interfaces for interacting with registration data and automating submissions



### Reporting

Increased capabilities to not only create and use reports but also explore data and analyses



### **Regulator Interactions**

New functionality for firms to respond to inquiries, collaborate with FINRA and resolve regulatory tasks.



## FINRA's Digital Experience Transformation

- We are undertaking an effort to expand upon the CRD Transformation and overhaul how the industry interacts with all of FINRA by addressing common problems and opportunities:
  - Integrating the "big picture" of compliance activities,
  - Flexible access to data,
  - Automating tasks,
  - Consolidating notifications,
  - Promoting early warning indicators, and
  - Instituting best-in-class customer service and support

**COLLABORATION & COMMUNICATION** TASK MANAGEMENT & NOTIFICATION INFO TO FINRA INFO FROM FINRA WORLD CLASS CUSTOMER SUPPORT & KNOWLEDGE BASE

Centralized, Personalized, Automated

PERSONALIZED USER EXPERIENCE

SYSTEM TO SYSTEM INTERFACE

# Digital Experience Transformation Enhances CRD Transformation



- Unified and simplified user experience
  - Activities for Registration, Disclosure & Education → Activities for the entire firm
- Flexible and firm-driven collaboration and communication
  - Disclosure Letters Process → Common experience and features for all information requests by FINRA
- Centralized notifications & audit
  - Queue, Report Center & CE Notifications → FINRA Notifications with user controlling when & how
- Guided information and data submission process
  - Individual Apps & Forms → Consistent experience and removal of duplication (collect once/use many)
- Customized data exploration and repeatable data export
  - App-based static reports → Customizable data reporting, manipulation, and exporting inside and across domains
- Flexible system-to-system integration
  - Limited and inconsistent interfaces → Prioritization of support for integration and automation

## FINCA

## **Key Takeaways, Timelines and Events**

### Takeaways

- Please continue to provide feedback (<u>www.finra.org/newcrd</u> or <u>webcrd@finra.org</u>)
- The New "Be In the Know" page is a key resource for events, new features and soon to be launched functionality (<a href="http://www.finra.org/industry/be-know">http://www.finra.org/industry/be-know</a>)
- Support Materials for Classic & New CRD are available (http://www.finra.org/industry/crd/training-support)
- We want to support your efforts to onboard representatives to FinPro (finprofeedback@finra.org)

#### Timelines

 March 15 – June 30: EFT Firms need to migrate to the new fileX platform – http://www.finra.org/industry/web-eft/migration-to-filex

#### O Events

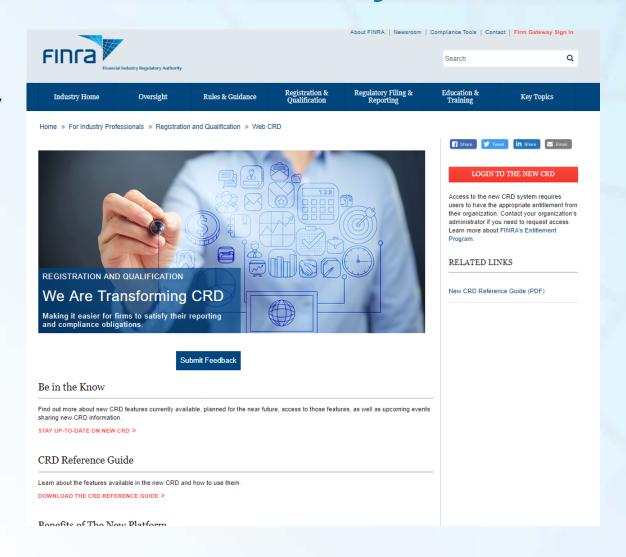
- FINRA Annual Conference in Washington DC, May 15 May 17
- SILA National Education Conference in San Diego, September 15 September 18
- Look for roundtables, webinars and other virtual meetings



## Think big... Start small... Deliver incrementally...

Get alerts about preview and pilot opportunities!
Let us know what you want next!

finra.org/newcrd







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# Thanks For Joining Us Today!





## 2019 ARM Educational Conference

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Testing and Continuing Education

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## **Qualification Exams**

### October 1, 2018, Rollout



- Securities Industry Essentials (SIE) Exam became available.
- The representative-level qualification exams have been restructured — most are now shorter in length.
- The registration rules have been consolidated into the FINRA Rule 1200 Series.



### **SIE Exam Content Committee**

- SIE content committee consists of 30+ industry professionals from member firms
- Tasked with helping FINRA create the SIE exam content outline
- Helped determine SIE vs. top-off exam subject matter
- Wrote questions for SIE exam and met quarterly for 3+ years to review and edit SIE questions







## **Pre-SIE Rollout Activity**



- Series 6 and Series 7 legacy exam volume was up 30% in August and September 2018 as compared to 2017.
- Series 6 and Series 7 pass rates for this period in 2018 declined as compared to 2017.



## SIE Exam Enrollment Options for Firms

- Two CRD options for firm to request enrollments for the SIE exam.
  - Form U4: request a rep-level registration
  - Test Enrollment Services System (TESS)
    - o Individual: request enrollment for one candidate
    - Group: upload a list of candidates
    - Purchase vouchers: used by candidates to enroll for the SIE



### **SIE Enrollments and Administrations**

- SIE enrollments as of January 31, 2019:
  - 29,612 SIE enrollments
    - Form U4 enrollments: 59%
    - TESS enrollments: 41%
  - 2,153 vouchers purchased
- SIE administrations as of January 31, 2019:
  - 16,195 SIE administrations
  - Overall pass rate of 74%



## **Top-off Quals Exams (1st Time Candidates)**

### Administrations as of January 31, 2019:

- Series 6 exam 2,508
- Series 7 exam 5,767
- Series 79 exam 485

### Pass-through rates:

- SIE + Series 6: 59%
- SIE + Series 7: 71%
- SIE + Series 79: 87%



### SIE: Academic Outreach

- In 2019, FINRA is focusing on raising awareness of the SIE exam with colleges and universities.
- FINRA will target career counseling offices to educate them on the benefit of students taking the SIE exam while in school.
- FINRA will also reach out to professors to assist with understanding the breadth and depth of content covered on the SIE exam.



### SIE: Academic Outreach (cont.)

- FINRA will place a special emphasis on outreach to historically black colleges and universities (HBCUs) and other diversity organizations.
- FINRA will develop "SIE toolkits":
  - a toolkit for schools to use to develop and refine their message about the SIE to students, and
  - a toolkit for firms to use in partnering with schools to promote the SIE to students.



## **Principal Exam Restructure**

- FINRA is developing a proposal to restructure the principal-level qualification exam program.
- The proposal will focus on streamlining the program and taking advantage of the benefits of the restructured replevel program.
- The proposal will be vetted with the industry through focus panels and other means.



## Principal Exam Restructure (cont.)

• Interested in providing input through a focus panel or otherwise?

Reach out to Joe McDonald at: joe.mcdonald@finra.org.



# **Continuing Education**



### **CE Council Enhancement Recommendations**

- The Securities Industry/Regulatory Council on Continuing Education (CE Council) published a group of potential CE program enhancements on September 6, 2018.
- FINRA Regulatory Notice 18-26 collected 21 comments over two months.
- CE Council will publish a final set of recommendations that are informed by the comments received.



## **Regulatory Element Recommendations**

- Transitioning to an annual requirement
  - Improved relevance and currency
  - Technology improvements to mitigate administrative impact
- Tying Regulatory Element content to registrations
  - Improved relevance



### Firm Element Recommendations

- Improving Firm Element guidance from CE Council
- Consolidating training requirements where possible
  - Additional regulatory training requirements
  - Non-regulatory credentialing programs
- Establishing a centralized content catalog
  - Improved access to appropriate learning materials
  - Optional source of Firm Element content

## Maintaining Qualification Status After Termination FINCA

- CE Council is asking regulators to consider a new mechanism to allow registered individuals to maintain their qualification status while away from the industry.
- This would be a CE program that includes both the Regulatory Element and additional learning content comparable to Firm Element.
- There would be eligibility requirements and program term limits.



## **Next Steps**

- Formal CE Council recommendations
- Regulatory Notice to provide more information about the CE program changes and proposed rule language
- Opportunity for industry feedback
- Submission of rule filings to the SEC



