

Information Notice

2021 and First Quarter of 2022 Report Filing Due Dates

Annual Report; FOCUS; Form Custody; Supplemental Statement of Income (SSOI); Supplemental Schedule for Derivatives and Other Off-Balance Sheet Items (OBS); and Supplemental Inventory Schedule (SIS)

Summary

To assist members in their financial reporting obligations, FINRA is issuing this *Notice* to provide the due dates for Annual Report, Financial and Operational Combined Uniform Single (FOCUS), Form Custody, and supplemental FOCUS Report filings that are due in 2021 or the first quarter of 2022.¹ Members are reminded that all such filings submitted to FINRA must be made electronically through FINRA Gateway.

The due dates set forth in this *Notice* are solely as to the filings that are specified in the *Notice* and required under SEA Rule 17a-5 or FINRA Rule 4524. These due dates take into account the federal holiday calendar as appropriate.

The SEC has adopted changes to FOCUS reporting requirements in connection with security-based swaps.² Prior to implementation of the changes, FINRA will separately provide guidance and instructions for reporting through FINRA Gateway.

Questions regarding this *Notice* should be directed to your firm's Risk Monitoring Analyst.

Background

Annual Report

Firms must submit their annual reports to FINRA in electronic form.³ Pursuant to SEA Rule 17a-5(d)(6), firms must also file the report at the regional office of the SEC in which the firm has its principal place of business and the SEC's principal office in Washington, D.C. Members are reminded that the SEC has a process for electronic filing of annual reports, in lieu of filing in paper form, which the SEC simplified and updated in January 2017.⁴

November 23, 2020

Suggested Routing

- ▶ Compliance
- ▶ Legal
- ▶ Operations
- ▶ Regulatory Reporting
- ▶ Senior Management

Key Topic(s)

- ▶ Annual Report Filings
- ▶ FOCUS Report Filings
- ▶ Form Custody Filings
- ▶ Supplemental Inventory Schedule
- ▶ Supplemental Schedule for Derivatives and Other Off-Balance Sheet Items
- ▶ Supplemental Statement of Income

Referenced Rules and Notices

- ▶ Regulatory Notice 11-46
- ▶ Regulatory Notice 12-11
- ▶ Regulatory Notice 14-43
- ▶ Regulatory Notice 16-11
- ▶ Regulatory Notice 17-07
- ▶ SEA Rule 15c3-1
- ▶ SEA Rule 17a-5

Rule 17a-5(d)(6) requires firms that are members of the Securities Investor Protection Corporation (SIPC) to file the annual report with SIPC. Members are reminded that in August 2017, SIPC and FINRA announced an agreement designed to ease reporting burdens and compliance costs for firms.⁵ Pursuant to the agreement, when a firm that is a SIPC member files an annual report through FINRA Gateway on or after September 1, 2017, this will also constitute filing with SIPC. Members may consult the [SIPC website](#) for further information.

Filings are due no later than 11:59 p.m. Eastern Time (ET) on the due dates listed in this *Notice*.

Annual Reports

Period Ending	Due Date
November 30, 2020	January 29, 2021
December 31, 2020	March 1, 2021
January 31, 2021	April 1, 2021
February 28, 2021	April 29, 2021
March 31, 2021	June 1, 2021
April 30, 2021	June 29, 2021
May 31, 2021	July 30, 2021
June 30, 2021	August 30, 2021
July 31, 2021	September 29, 2021
August 31, 2021	November 1, 2021
September 30, 2021	November 29, 2021
October 31, 2021	December 30, 2021
November 30, 2021	January 31, 2022
December 31, 2021	March 1, 2022

FOCUS Reports

Firms must submit their FOCUS Reports electronically through the eFOCUS System available via FINRA Gateway. For information about completing the FOCUS Report, please see the [FOCUS Report submission guidance](#).

Monthly and Fifth⁶ FOCUS Part II/IIA Filings

Period End	Due Date
January 31, 2021	February 24, 2021
February 28, 2021	March 23, 2021
April 30, 2021	May 25, 2021
May 31, 2021	June 23, 2021
July 31, 2021	August 24, 2021
August 31, 2021	September 24, 2021
October 31, 2021	November 24, 2021
November 30, 2021	December 23, 2021

Quarterly FOCUS Part II/IIA Filings

Quarter Ending	Due Date
December 31, 2020	January 27, 2021
March 31, 2021	April 23, 2021
June 30, 2021	July 26, 2021
September 30, 2021	October 26, 2021
December 31, 2021	January 26, 2022

Annual Schedule I Filings

Period	Due Date
2020	January 27, 2021
2021	January 26, 2022

Form Custody

Firms are required to file Form Custody pursuant to SEA Rule 17a-5(a)(5).

Form Custody Filings

Quarter Ending	Due Date
December 31, 2020	January 27, 2021
March 31, 2021	April 23, 2021
June 30, 2021	July 26, 2021
September 30, 2021	October 26, 2021
December 31, 2021	January 26, 2022

Supplemental Statement of Income (SSOI)

Firms must file the SSOI on a quarterly basis.⁷

SSOI Filings

Quarter Ending	Due Date
December 31, 2020	February 1, 2021
March 31, 2021	April 28, 2021
June 30, 2021	July 29, 2021
September 30, 2021	October 29, 2021
December 31, 2021	January 31, 2022

Supplemental Schedule for Derivatives and Other Off-Balance Sheet Items (Form OBS)

Unless subject to the *de minimis* exception, the Form OBS must be filed by (1) all FINRA member firms that self-clear their proprietary transactions or clear transactions for others or carry customer accounts; and (2) all other FINRA member firms that have, pursuant to SEA Rule 15c3-1, a minimum dollar net capital requirement equal to or greater than \$100,000 and at least \$10 million in reportable items pursuant to the Form OBS.⁸ Any firm that is required to file the Form OBS must do so as of the last day of a reporting period within 22 business days of the end of each calendar quarter by using the eFOCUS system. A firm that claims the *de minimis* exception must affirmatively indicate through the eFOCUS system that no filing is required for the reporting period. For more information on the Form OBS, including Frequently Asked Questions, please see the [Derivatives and Other Off-Balance Sheet Items \(OBS\)](#) page.

Form OBS Filings

Quarter Ending	Due Date
December 31, 2020	February 3, 2021
March 31, 2021	April 30, 2021
June 30, 2021	August 2, 2021
September 30, 2021	November 2, 2021
December 31, 2021	February 2, 2022

Supplemental Inventory Schedule (SIS)

The SIS must be filed by a firm that is required to file FOCUS Report Part II, FOCUS Report Part IIA or FOGS Report Part I, with inventory positions as of the end of the FOCUS or FOGS reporting period, unless the firm has (1) a minimum dollar net capital or liquid capital requirement of less than \$100,000; or (2) inventory positions consisting only of money market mutual funds.⁹ A firm with inventory positions consisting only of money market mutual funds must affirmatively indicate through the eFOCUS system that no SIS filing is required for the reporting period.

SIS Form Filings

Month Ending	Due Date
December 31, 2020	February 1, 2021
January 31, 2021	March 1, 2021
February 28, 2021	March 26, 2021
March 31, 2021	April 28, 2021
April 30, 2021	May 28, 2021
May 31, 2021	June 28, 2021
June 30, 2021	July 29, 2021
July 31, 2021	August 27, 2021
August 31, 2021	September 29, 2021
September 30, 2021	October 29, 2021
October 31, 2021	November 30, 2021
November 30, 2021	December 29, 2021
December 31, 2021	January 31, 2022

FINRA Gateway and Entitlements

Firms are reminded that they must use their current FINRA entitlement user ID and password to access FINRA Gateway. Questions regarding access to FINRA Gateway should be directed to the firm's Super Account Administrator (SAA). Questions regarding the filing of reports, the resetting of passwords or general technical concerns regarding system requirements should be directed to FINRA Business and Technology Support Services at (800) 321-6273.

Endnotes

1. All such filings must be received by FINRA by their required due dates to avoid specified fees as set forth in Schedule A to FINRA's By-Laws and to avoid suspension of FINRA membership.
2. See [Securities Exchange Act Release No. 87005](#) (September 19, 2019), 84 FR 68550 (December 16, 2019) (Final Rule: Recordkeeping and Reporting Requirements for Security-Based Swap Dealers, Major Security-Based Swap Participants, and Broker-Dealers).
3. See [Regulatory Notice 11-46](#) (Annual Audit Reports: FINRA to Require Electronic Submission of Annual Audit Reports) (October 2011).
4. See [Electronic Filing of Broker-Dealer Annual Reports](#) on the SEC website; see also [Regulatory Notice 17-07](#) (Updated SEC No-Action Guidance and Instructions on Electronic Filing of Broker-Dealer Annual Reports) (February 2017).
5. See FINRA News Release, [SIPC and FINRA Streamline Reporting Process for Broker-Dealers](#) (August 1, 2017).
6. A Fifth FOCUS Report is an additional report that is due from a member firm whose fiscal year end is a date other than a calendar quarter.
7. See [Regulatory Notice 12-11](#) (Supplemental FOCUS Information) (February 2012).
8. See [Regulatory Notice 16-11](#) (Supplemental FOCUS Information) (April 2016).
9. See [Regulatory Notice 14-43](#) (SEC Approves Supplemental Inventory Schedule) (October 2014).