

Regulatory Notice

25-09

Supporting Member Compliance

FINRA Enhances Its Systems to Enable Members to Provide Associated Persons With Uniform Registration Form and Predispute Arbitration Information Through FinPro Gateway

Effective Date: November 3, 2025

Summary

FINRA rules require members to provide associated persons with specified information relating to the uniform registration forms and predispute arbitration. FINRA has observed that members currently satisfy some of these requirements through manual processes, such as delivery of the information via U.S. mail. As part of the FINRA Forward initiatives, FINRA has made enhancements to its systems to give members the option of satisfying these requirements electronically via FINRA's Financial Professional Gateway (FinPro Gateway™) beginning November 3, 2025.¹

Questions concerning this *Notice* should be directed to:

- ▶ Afshin Atabaki, Vice President and Associate General Counsel, Office of General Counsel (OGC), at Afshin.Atabaki@finra.org or (202) 728-8902;
- ▶ Bill Swanstrom, Vice President, Credentialing, Registration, Education and Disclosure, at William.Swanstrom@finra.org or (240) 386-4731;
- ▶ John Nachmann, Associate General Counsel, OGC, at John.Nachmann@finra.org or (240) 386-4816; or
- ▶ Nick Vitalo, Assistant General Counsel, OGC, at Nicholas.Vitalo@finra.org or (646) 315-8474.

August 15, 2025

Notice Type

- ▶ Guidance

Suggested Routing

- ▶ Compliance
- ▶ Legal
- ▶ Operations
- ▶ Registered Representatives
- ▶ Registration
- ▶ Senior Management

Key Topics

- ▶ Electronic Delivery
- ▶ FinPro Gateway
- ▶ Form U4
- ▶ Form U5
- ▶ Predispute Arbitration Disclosure

Referenced Rules & Notices

- ▶ Article V, Section 3 of the FINRA By-Laws
- ▶ FINRA Rule 1010
- ▶ FINRA Rule 2263
- ▶ Regulatory Notice 25-07

Background & Discussion

This *Notice* is part of the FINRA Forward initiatives, which are intended to, among other things, modernize FINRA's rules, guidance and processes and empower member compliance.² In [Regulatory Notice 25-07](#) (April 14, 2025) (*RN 25-07*), FINRA requested comment on modernizing its rules, guidance and processes for the organization and operation of member workplaces, including specifically requesting comment regarding ways to employ FINRA's systems to address practical issues members experience when delivering to associated persons documents required under FINRA rules (such as the requirement to provide a copy of the Form U5 (Uniform Termination Notice for Securities Industry Registration) to associated persons whose registrations with the member have been terminated) and to create efficiencies for its members or provide improved functionality.

As discussed in *RN 25-07*, FINRA previously leveraged FinPro Gateway to streamline the work associated with the onboarding of applicants for registration by allowing applicants to collaborate with members to complete a draft Form U4 (Uniform Application for Securities Industry Registration or Transfer) and to electronically sign it.³

In the spirit of continuous improvement, FINRA has now developed additional enhancements to its systems to enable members to provide Form U4, Form U5 and predispute arbitration information to associated persons via FinPro Gateway. This will give members the option of satisfying their regulatory obligations through FINRA systems in a more timely and efficient manner. In addition, members that currently use manual processes to provide this information to associated persons may realize cost savings by using FinPro Gateway instead. As discussed in greater detail below, using FinPro Gateway for these purposes is optional and members and associated persons that use FinPro Gateway for these purposes would need to satisfy certain conditions, including an acknowledgement by associated persons that they may receive the required information via FinPro Gateway.

FINRA is also reviewing the comments received in response to *RN 25-07* and is evaluating additional ways that it can leverage its systems to support member compliance.

Members' Obligations to Provide Form U4, Form U5 and Predispute Arbitration Information to Associated Persons

The following FINRA rules require members to provide associated persons with information relating to the uniform registration forms and predispute arbitration. FINRA has observed that members currently use manual processes (such as using a third-party service that offers delivery confirmation) to satisfy some of these obligations.

FINRA Rule 1010(c)

Rule 1010(c) (Form U4 Filing Requirements) addresses the filing and signature requirements for initial, transfer and amended Form U4s. For any amendments to the disclosure information on an associated person's Form U4 (e.g., regulatory actions), Rule 1010(c)(1) requires a member to file with FINRA an amended Form U4 that is based on a signed copy of the form provided to the member by the associated person prior to the filing.⁴ Alternatively, pursuant to Rule 1010(c)(2), the member may file the amended Form U4 after it uses reasonable efforts to *provide* the associated person with a copy of the amended disclosure information and, prior to the filing, obtains a written acknowledgment (which may be electronic) from the associated person that the associated person has received and reviewed the amended disclosure information. If the member cannot obtain either the signature or written acknowledgment of the associated person prior to the filing, Rule 1010(c)(3) allows the member to proceed with filing the amended disclosure information as to which it has knowledge and use reasonable efforts to *provide* the associated person with a copy of the amended disclosure information that was filed with FINRA.⁵

For any amendments to the administrative information on an associated person's Form U4 (e.g., work and residential location), Rule 1010(c)(4) allows a member to file such amendments without obtaining the signature or written acknowledgment of the associated person. However, the rule requires the member to use reasonable efforts to *provide* the associated person with a copy of the amended administrative information that was filed with FINRA.

Article V, Section 3 of the FINRA By-Laws

Article V, Section 3 of the FINRA By-Laws (Notification by Member to the Corporation and Associated Person of Termination; Amendments to Notification) requires a member to submit to FINRA an initial Form U5 within 30 calendar days of terminating an associated person's registration and an amended Form U5 within 30 calendar days after the member learns of facts or circumstances giving rise to an amendment to such individual's Form U5. This provision also requires the member to *provide* a copy of the initial and, if any, amended Form U5 to the individual whose registration was terminated.

FINRA Rule 2263

FINRA Rule 2263 (Arbitration Disclosure to Associated Persons Signing or Acknowledging Form U4) requires a member to *provide* each associated person with certain written disclosures regarding the nature and process of arbitration proceedings whenever the firm asks an associated person, pursuant to Rule 1010(c), to sign a Form U4 or to acknowledge in writing information filed on the form.

Use of FinPro Gateway to Satisfy Delivery Obligations

As part of FINRA's efforts to further leverage FINRA systems to support member compliance, FINRA has developed technological enhancements to its systems to allow members to provide the Form U4, Form U5 and predispute arbitration information discussed above to associated persons in a more efficient and timely manner via FinPro Gateway. These enhancements will also benefit associated persons by affording them a secure, central location to access this information in a timely manner. These enhancements will be implemented starting on November 3, 2025.⁶ However, the use of FinPro Gateway for these purposes will be optional for both members and associated persons.

In addition, FINRA will not assess any charges to those members that rely on FinPro Gateway to provide the required information to associated persons. Therefore, members that use FinPro Gateway to satisfy these obligations may experience cost savings compared to using other methods, such as delivery via a third-party service.

For members to rely on FinPro Gateway to provide Form U4, Form U5 and predispute arbitration information to associated persons, members and associated persons must meet the following conditions:

1. the associated person must create a FinPro Gateway account, which includes providing a valid personal email address and an optional business email address;
2. the member must make reasonable efforts to validate the email addresses linked to the associated person's FinPro Gateway account (for example, by requiring the associated person to validate his or her FinPro Gateway email addresses as part of an annual attestation process);
3. the member must notify the associated person in writing that the member will rely on FinPro Gateway to provide, as may be the case, copies of Form U5s pursuant to Article V, Section 3 of the FINRA By-Laws, predispute arbitration information pursuant to Rule 2263, or amended Form U4 information pursuant to Rules 1010(c)(2), (c)(3) or (c)(4);
4. the associated person must acknowledge to the member that he or she may receive the required information via FinPro Gateway; and
5. the member must elect through FinPro Gateway to provide to the associated person the required information.⁷

Further, once a member provides the required information to an associated person via FinPro Gateway, FINRA will notify the associated person through his or her FinPro Gateway personal email address (and his or her FinPro Gateway business email address, if provided by the associated person) that the information is available for viewing. For monitoring purposes, members will also have the option of requesting that FINRA send a copy of these emails to an email address provided by the member, such as to the member's compliance department.

Conclusion

FINRA believes that enabling members to satisfy their obligations to provide Form U4, Form U5 and predispute arbitration information to associated persons via FinPro Gateway will allow members to meet these obligations in a more cost efficient and timely manner. This will also benefit associated persons by allowing them to receive the information in a timely manner and in a centralized and secure location. As discussed above, the use of FinPro Gateway for these purposes will be optional and available at no additional cost.

In addition, as noted above, as part of the FINRA Forward initiatives, FINRA requested comment in *RN 25-07* on how to further leverage its systems to support member compliance with regulatory requirements and reduce unnecessary burdens. FINRA is currently reviewing the comments received in response to that *Notice* and will continue to explore ways that it can leverage its systems, including additional enhancements to FinPro Gateway, to support member compliance.

Endnotes

- 1 FinPro Gateway is a secure, centralized portal that provides current and former associated persons direct access to their registration, qualification and continuing education information, including the ability to view their Central Registration Depository® (CRD system) record. For instance, current and former associated persons use their FinPro Gateway accounts to access the Regulatory Element of continuing education and to participate in the Maintaining Qualifications Program (MQP). Approximately 880,000 individuals currently have a FinPro Gateway account. For information on how to create a FinPro Gateway account, please refer to [Creating a FinPro Account](#).
- 2 See [FINRA Announces New “FINRA Forward” Initiatives to Support Members, Markets and Investors](#) (April 21, 2025).
- 3 FINRA has implemented an electronic signature capability through FinPro Gateway that provides a secure mechanism for individuals and members to sign and submit Form U4 filings to comply with the signature requirement under Rule 1010(c)(1). See [Creating Form U4 in FinPro](#) (discussing Allow Rep Edits and E-Signature features).
- 4 See *id.*
- 5 In such cases, the member must enter “Representative Refused to Sign/Acknowledge,” “Representative Not Available,” or a substantially similar entry in the Form U4 signature field for the associated person’s signature. See Rule 1010.03 (Filing of Amendments Involving Disclosure Information).
- 6 For purposes of Rule 1010(c)(2)(A), members will be able to use FinPro Gateway’s Allow Rep Edits feature to provide the amended Form U4 information to the associated person. See [Creating Form U4 in FinPro](#). However, for purposes of Rule 1010(c)(2)(B), if the associated person and member determine not to use FinPro Gateway’s E-Signature feature, the member will need to use an alternative method to obtain the associated person’s written acknowledgement. Further, for purposes of Rule 2263, a member will be able to use FinPro Gateway to provide the required disclosures to an associated person only if the associated person and member use FinPro Gateway’s E-Signature feature.
- 7 To learn how to make this election, please visit [FinPro Firm Resources](#). FINRA will update the site with relevant information on November 3, 2025.

©2025. FINRA. All rights reserved. Regulatory Notices attempt to present information to readers in a format that is easily understandable. However, please be aware that, in case of any misunderstanding, the rule language prevails.