

Regulatory Notice 25-09 Adoption Recommendations

Recommendations to Meet the Conditions Described in Regulatory Notice 25-09

This document was developed in collaboration with FINRA's Licensing and Registration Council (LRC) and a working group of other registration compliance leaders, to support other member firms as they consider their approach and procedural changes to successfully adopt and rely on the new capabilities announced in Regulatory Notice 25-09.

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Recommendations

The recommendations below are not the only way that your firm can meet the conditions described in [Regulatory Notice 25-09](#), but they do provide a potential path to satisfy the regulatory obligations identified in the Notice by providing information via the Financial Professional Gateway (FinPro Gateway™), starting on Nov. 3 2025. These recommendations allow firms to leverage FINRA systems and resources without the need for additional technology investments.

25-09 Condition	Recommendation on Nov. 3, 2025	Recommendation for New Individuals Moving Forward
1. The associated person must create a FinPro Gateway account, which includes providing a valid personal email address and an optional business email address.	Starting on Nov. 3, 2025, use the FinPro Access Tracking Report to identify any registered individuals that do not yet have a FinPro Gateway account. If there are registered individuals that have not yet created their FinPro Gateway accounts, work with them to create their accounts. This will give you confidence that all current registered individuals have FinPro Gateway accounts. FINRA has provided a Creating a FinPro Gateway Account Guide (PDF) that you can share with your associated persons to support them as they create their accounts.	Have associated persons create their FinPro Gateway accounts as part of their onboarding or registration, leveraging the FinPro Access Tracking Report to ensure that their accounts are created. This will give you confidence that all newly registered individuals will have FinPro Gateway accounts. FINRA has provided a Creating a FinPro Gateway Account Guide (PDF) that you can share with your associated persons to support them as they create their accounts.

25-09 Condition	Recommendation on Nov. 3, 2025	Recommendation for New Individuals Moving Forward
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 their FinPro Gateway email addresses as part of an annual attestation process).	As part of your Nov. 3, 2025 communication to associated persons (see condition # 3), instruct individuals to log in to FinPro Gateway and verify that their personal and business email addresses are valid by completing their assigned email confirmation task. This task is assigned to FinPro Gateway users every three months. Therefore, if a user has confirmed their email address(es) at any point during the quarter (since Oct. 1, 2025), this task will not be available to the user again until Jan. 1, 2026. There are two FINRA Gateway reports that are available to help you monitor email address validity until your next annual attestation process: 1. On or before Nov. 19, 2025, the FinPro Access Tracking report will include the date of the last time an individual completed their email confirmation task. 2. On or after Nov. 19, 2025, the Notifications Tracking report can be used to identify bounced email notifications sent to FinPro users. FINRA has provided a Maintaining Email Addresses in FinPro Gateway Guide (PDF) that you can share with your associated persons to support them confirming their email addresses. Note: The email confirmation task was introduced as part of the FinPro Gateway Modernization release on June 27, 2025. As noted above, the last time a FinPro Gateway user completed this task will be available on the FinPro Access Tracking Report no later than Nov. 19, 2025, but the email confirmation date could be as early as June 27, 2025. As suggested in the Notice, also modify your firm's annual attestation processes to require that all associated persons log in to FinPro Gateway and confirm their personal and business email addresses by completing their assigned email confirmation tasks.	As associated persons create their FinPro Gateway accounts as part of their onboarding or registration, have them verify to the firm that their email addresses were accurately added to their FinPro Gateway account. FINRA has provided a Maintaining Email Addresses in FinPro Gateway Guide (PDF) that you can share with your associated persons to support them confirming their email addresses.

25-09 Condition	Recommendation on Nov. 3, 2025	Recommendation for New Individuals Moving Forward
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 Forms U5 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).	On Nov 3, 2025, send a communication to all associated persons specifying the required information that your firm will rely on FinPro Gateway to provide (see condition # 5). Also see the: 1. recommendation for condition # 2, to include an instruction to associated persons to log in to FinPro Gateway and confirm their email addresses by completing their assigned email confirmation task, and 2. recommendation for condition # 4, to include instruction to associated persons to acknowledge that they will receive the required information via FinPro Gateway if they haven't already done so. Note: You may also want to take this opportunity to share sample emails that your associated persons will receive from FINRA once your firm has opted in. It may also be helpful to share that these emails will be sent from notifications@finra.org. In our experience, firms share this information so that associated persons know that these emails are not spam or part of phishing scams. You can request these sample emails by sending an email to finprofeedback@finra.org. A sample communication that you can modify to work for your firm, is included in Appendix B at the end of this guide.	When you instruct new associated persons to create their FinPro Gateway accounts, specify the required information that your firm will rely on FinPro Gateway to provide (as noted in condition # 5, you will also need to opt in through FinPro Gateway in order to provide any required information). Note: You may also want to take this opportunity to share sample emails that your associated persons will receive from FINRA once your firm has opted in. In our experience, firms share these samples so associated persons know that these emails are not spam or part of phishing scams. You can request these sample emails by sending an email to finprofeedback@finra.org.

25-09 Condition	Recommendation on Nov. 3, 2025	Recommendation for New Individuals Moving Forward
4. The associated person must acknowledge to the member that they may receive the required information via FinPro Gateway.	Starting on Nov. 3, 2025, all FinPro Gateway users will be intercepted with an “Important Terms Update” modal window upon logging in, prompting them to acknowledge that FINRA member firms they are currently registered with, or that they associate with in the future, may rely on FinPro Gateway to electronically provide required information to them—even if their firm hasn’t yet elected to provide information through FinPro Gateway. A screen shot of the “Important Terms Update” modal window is included in Appendix A of this document. As users log in to FinPro Gateway to verify their email addresses, these acknowledgments will be collected. On or before Nov. 19, 2025, the FinPro Access Tracking Report will include the date your associated persons made their acknowledgments. Use the report to ensure that all of your associated persons have made their acknowledgments prior to, or within a reasonable period following, your firm’s election to provide the information via FinPro Gateway (see condition # 5). For additional guidance, reference the FAQ available within the Satisfying Regulatory Obligations: Using FinPro Gateway to Provide Required Information to Associated Persons section of the FinPro Gateway Firm Resources page on FINRA.org. FinPro Gateway users are able to dismiss the “Important Terms Update” modal window without providing their acknowledgment. However, they will continue to be intercepted with the modal window after logging in until the acknowledgment is provided. Additional outreach may be necessary to encourage users to provide their acknowledgment. You may want to modify your annual attestation processes to collect this acknowledgment to ensure that your entire associated person population has provided the acknowledgment.	As your new associated persons create their FinPro Gateway accounts, leverage the FinPro Access Tracking Report to ensure that they have made the required acknowledgment. This will give you confidence that all newly associated persons have made their acknowledgment.

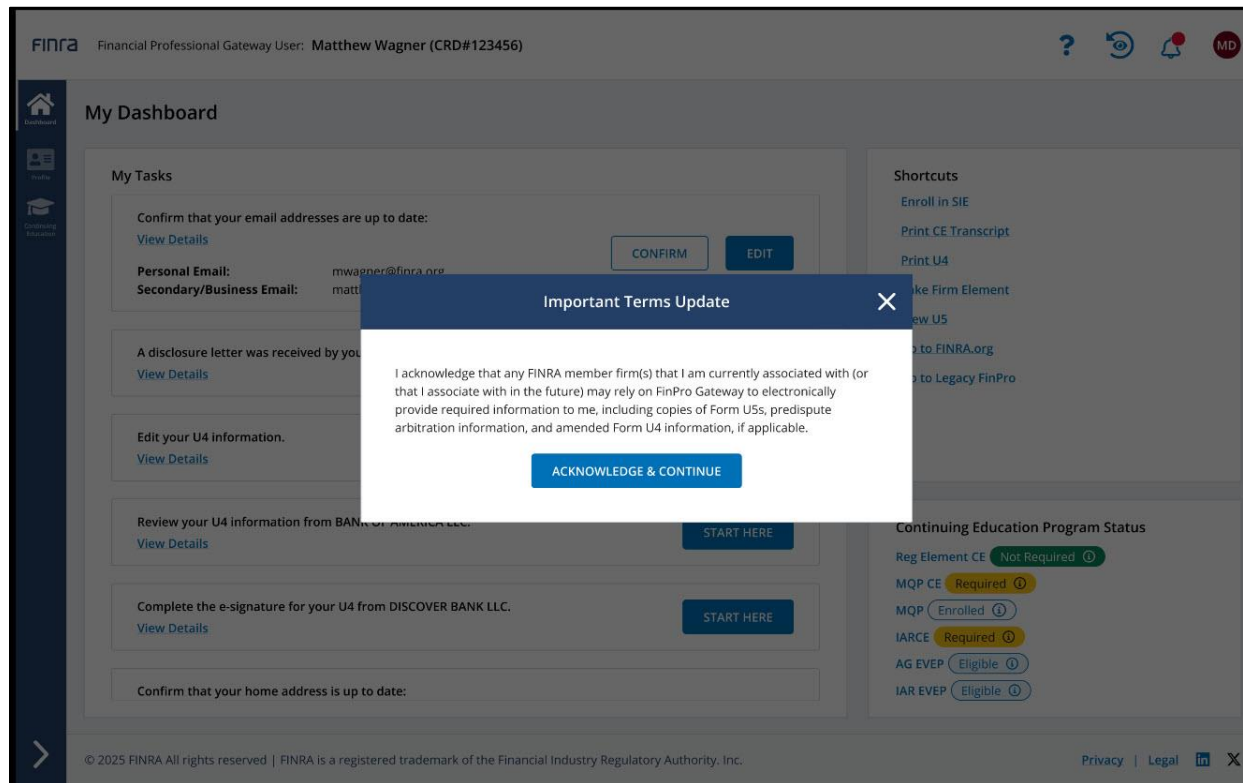
25-09 Condition	Recommendation on Nov. 3, 2025	Recommendation for New Individuals Moving Forward
5. The member must elect through FinPro Gateway to provide to the associated person the required information.	On Nov. 3, 2025, following the instructions described in the newly updated Firm Settings Guide (PDF) , opt in to provide the required information through FinPro Gateway.	Once your firm has opted in to the firm settings, there is nothing else to do on a go forward basis.

Additional Considerations:

1. Since your firm can only rely on FinPro Gateway to deliver predispute arbitration information if you and your associated persons utilize FINRA's E-Signature functionality (to collect those individuals' signatures when required by FINRA Rule 1010), your firm will need to:
 - a. opt in to use FINRA's E-Signature functionality (if it has not already), AND
 - b. ensure that your firm's procedures and practices leverage that capability to collect associate persons' signatures when required under FINRA Rule 1010.
2. If you intend to rely on the FinPro Gateway Access Tracking report to confirm that the individual has a FinPro Gateway account, has confirmed their email addresses or has made the required acknowledgment, please be aware that individuals subject to a full Form U5 filing will no longer appear on the report.
3. If you ever need to establish that information was provided via FinPro Gateway for business or regulatory reasons, the date when your firm opted in can be found on the firm settings screen in FINRA Gateway.

Appendix A: FinPro Gateway Acknowledgment

When a FinPro Gateway user logs in, they will be presented with the **Important Terms Update** modal window to acknowledge that their firm may use FinPro Gateway to electronically provide required information, including copies of Forms U5, predispute arbitration information and amended Form U4 information. This window will no longer appear to a FinPro Gateway user once they have made the acknowledgment.



Appendix B: Sample Communication for Condition # 3

Dear [Associated Person],

Effective Nov. 3, 2025, our firm will rely on the Financial Professional Gateway (FinPro Gateway™) to provide you copies of Forms U5 pursuant to Article V, Section 3 of the FINRA By-Laws, predispute arbitration information pursuant to Rule 2263, and amended Form U4 information pursuant to Rules 1010(c)(2), (c)(3) or (c)(4).

To support this transition, log in to [FinPro Gateway](#) and:

1. Acknowledge that you will receive this information via FinPro Gateway by selecting the **ACKNOWLEDGE & CONTINUE** button in the **"Important Terms Update"** window that appears immediately after you log in.
2. Verify that your personal and business email addresses are valid by completing the "Confirm that your email addresses are up to date" task in FinPro Gateway. You will find this assignment in the My Task list on your FinPro Gateway dashboard. For more information, refer to the [Maintaining Email Addresses in FinPro Gateway Guide \(PDF\)](#). If you have confirmed your email addresses in FinPro Gateway are up to date since Oct. 1, 2025, you do not need to do it again.

We've attached some sample emails that represent the notifications you will receive from FINRA. These notifications will be sent from notifications@finra.org. Please familiarize yourself with these emails to support these changes.

Thank you,

[Your Name]

[Firm Name]