# **Information Notice**

# **2026 and First Quarter of 2027 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); Supplemental Inventory Schedule (SIS); and Supplemental Liquidity Schedule (SLS)

# **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 2026 or the first quarter of 2027. FINRA reminds members that all such filings they submit to FINRA must be made electronically through FINRA Gateway.

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

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.¹ Firms should note that the SEC has revised its requirements governing submission of annual reports to the SEC.² Pursuant to SEA Rule 17a-5(d)(6)(i), as amended, firms must file the annual report electronically with the SEC on EDGAR in Portable Document Format (PDF). The SEC no longer accepts paper submissions of the annual report.³ FINRA will issue a separate *Notice* with further information regarding the SEC's amendments.

# November 10, 2025

#### 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 Liquidity Schedule
- Supplemental Schedule for Derivatives and Other Off-Balance Sheet Items
- Supplemental Statement of Income

#### Referenced Rules and Notices

- ► FINRA Rule 4524
- ▶ Information Notice 6/3/21
- Regulatory Notice 11-46
- ► Regulatory Notice 12-11
- ► Regulatory Notice 14-43
- Regulatory Notice 16-11
- Regulatory Notice 17-07
- Regulatory Notice 21-05
- ► Regulatory Notice 21-31
- SEA Rule 15c3-1
- ▶ SEA Rule 15c3-3
- ► SEA Rule 17a-5



In February 2021, the SEC issued an order<sup>4</sup> that permits specified firms an additional 30 calendar days to file their annual reports as required pursuant to SEA Rule 17a-5(d), subject to certain conditions. The SEC's order, in response to a request by FINRA, is designed to ease potential burdens that smaller members may face in obtaining audit services. Members that meet the conditions set forth in the SEC's order and wish to avail themselves of the 30-day extension must provide notification to FINRA as described further in *Regulatory Notice 21-05*.<sup>5</sup>

SEA Rule 17a-5(d)(6)(ii), as amended, requires firms that are members of the Securities Investor Protection Corporation (SIPC) to file the annual report with SIPC. Through an agreement between SIPC and FINRA, when a firm that is a SIPC member files an annual report through FINRA Gateway, 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	Due Date for Firms That Meet Conditions for 30-Day Extension
November 30, 2025	January 29, 2026	March 2, 2026
December 31, 2025	March 2, 2026	March 31, 2026
January 31, 2026	April 1, 2026	May 1, 2026
February 28, 2026	April 29, 2026	May 29, 2026
March 31, 2026	June 1, 2026	June 29, 2026
April 30, 2026	June 29, 2026	July 29, 2026
May 31, 2026	July 30, 2026	August 31, 2026
June 30, 2026	August 31, 2026	September 28, 2026
July 31, 2026	September 29, 2026	October 29, 2026
August 31, 2026	October 30, 2026	November 30, 2026
September 30, 2026	November 30, 2026	December 29, 2026
October 31, 2026	December 30, 2026	January 29, 2027
November 30, 2026	January 29, 2027	March 1, 2027
December 31, 2026	March 1, 2027	March 31, 2027

# **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 FINRA's guidance on eFOCUS submission.

# Monthly and Fifth<sup>6</sup> FOCUS Part II/IIA Filings

Period Ending	Due Date
January 31, 2026	February 25, 2026
February 28, 2026	March 24, 2026
April 30, 2026	May 26, 2026
May 31, 2026	June 24, 2026
July 31, 2026	August 25, 2026
August 31, 2026	September 24, 2026
October 31, 2026	November 25, 2026
November 30, 2026	December 23, 2026

# **Quarterly FOCUS Part II/IIA Filings**

Quarter Ending	Due Date
December 31, 2025	January 27, 2026
March 31, 2026	April 23, 2026
June 30, 2026	July 24, 2026
September 30, 2026	October 26, 2026
December 31, 2026	January 27, 2027

# **Annual Schedule I Filings**

Period	Due Date
2025	January 27, 2026
2026	January 27, 2027

## **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, 2025	January 27, 2026
March 31, 2026	April 23, 2026
June 30, 2026	July 24, 2026
September 30, 2026	October 26, 2026
December 31, 2026	January 27, 2027

#### Supplemental Statement of Income (SSOI)

Firms must file the SSOI on a quarterly basis.7

#### **SSOI Filings**

Quarter Ending	Due Date
December 31, 2025	January 30, 2026
March 31, 2026	April 28, 2026
June 30, 2026	July 29, 2026
September 30, 2026	October 29, 2026
December 31, 2026	February 1, 2027

# 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 member firms that self-clear their proprietary transactions or clear transactions for others or carry customer accounts; and (2) all other 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. 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 <u>Derivatives and Other Off-Balance Sheet Items</u> (OBS) page.

#### Form OBS Filings

Quarter Ending	Due Date
December 31, 2025	February 3, 2026
March 31, 2026	April 30, 2026
June 30, 2026	July 31, 2026
September 30, 2026	November 2, 2026
December 31, 2026	February 3, 2027

# Supplemental Inventory Schedule (SIS)

The SIS must be filed by a firm that is required to file 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. 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.

FINRA reminds members that in 2021 FINRA revised<sup>10</sup> the SIS so that members that are filers of FOCUS Report Part II are no longer required to file the SIS.

#### **SIS Filings**

Month Ending	Due Date
December 31, 2025	January 30, 2026
January 31, 2026	March 2, 2026
February 28, 2026	March 27, 2026
March 31, 2026	April 28, 2026
April 30, 2026	May 29, 2026
May 31, 2026	June 29, 2026
June 30, 2026	July 29, 2026
July 31, 2026	August 28, 2026
August 31, 2026	September 29, 2026
September 30, 2026	October 29, 2026
October 31, 2026	December 1, 2026
November 30, 2026	December 29, 2026
December 31, 2026	February 1, 2027

### Supplemental Liquidity Schedule (SLS)

The SLS must be filed by each carrying member with \$25 million or more in free credit balances, as defined under SEA Rule 15c3-3(a)(8), and by each member whose aggregate amount outstanding under repurchase agreements, securities loan contracts and bank loans is equal to or greater than \$1 billion, as reported on the member's most recently filed FOCUS Report, unless otherwise permitted by FINRA in writing. The SLS must be completed as of the last business day of each month and filed within 24 business days after the end of the month. A member need not file the SLS for any period where the member does not meet the \$25 million or \$1 billion thresholds.

#### **SLS Filings**

Month Ending	Due Date
December 31, 2025	February 5, 2026
January 31, 2026	March 6, 2026
February 28, 2026	April 2, 2026
March 31, 2026	May 4, 2026
April 30, 2026	June 4, 2026
May 31, 2026	July 6, 2026
June 30, 2026	August 4, 2026
July 31, 2026	September 3, 2026
August 31, 2026	October 5, 2026
September 30, 2026	November 4, 2026
October 31, 2026	December 7, 2026
November 30, 2026	January 5, 2027
December 31, 2026	February 5, 2027

# **FINRA Gateway and Entitlements**

FINRA reminds firms 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.

#### **Endnote**

- See <u>Regulatory Notice 11-46</u> (Annual Audit Reports: FINRA to Require Electronic Submission of Annual Audit Reports) (October 2011).
- See Securities Exchange Act Release No. 101925
  (December 16, 2024), 90 FR 7250 (January 21,
  2025) (Final Rule: Electronic Submission of Certain
  Materials Under the Securities Exchange Act of
  1934; Amendments Regarding the FOCUS Report)
  (the "Electronic Filing Release"). See also Securities
  Exchange Act Release No. 103877 (September 8,
  2025), 90 FR 43552 (September 10, 2025) (Final
  Rule; Extension of Compliance Dates: Extension
  of Compliance Dates for Electronic Submission of
  Certain Materials Under the Securities Exchange
  Act of 1934; Amendments Regarding the FOCUS
  Report) (the "Extension Release").
- Firms must obtain EDGAR access credentials in order to submit their filings to the SEC. Firms that have not previously filed on EDGAR need to submit Form ID in accordance with instructions on the SEC website: <u>Apply for EDGAR Access—Applicants with an EDGAR Central Index Key (CIK) Account but No Access Codes.</u> Instructions on how to file annual reports through EDGAR may be found on the SEC website: <u>Electronic Filing of Form X-17A-5 Part III (Broker-Dealer, Security-Based Swap Dealer, and Major Security-Based Swap Participant Annual Reports).</u>

Further, pursuant to the SEC's new requirements, annual reports will need to be filed on EDGAR as Interactive Data Files subject to specified compliance dates as set forth by the SEC. For firms with a minimum fixed dollar net capital requirement greater than or equal to \$250,000 as of December 31, 2025, this requirement will apply to filings due on or after June 30, 2027. For all other firms, the requirement will apply to filings due on or after June 30, 2029. See the Electronic Filing Release and the Extension Release in note 1. See also SEA Rule 17a-5(d)(6)(i) and Rule 101(a)(1)(xxxii) under the SEC's Regulation S-T.

- See Securities Exchange Act Release No. 91128
   (February 12, 2021), 86 FR 10372 (February 19, 2021) (Order Extending the Annual Reports Filing Deadline for Certain Smaller Broker-Dealers).
- 5. Once a member that meets the conditions set forth in the SEC's order submits the required notification to FINRA, the notification need not be submitted again for as long as the member continues to meet those conditions. If a member no longer meets the conditions of the SEC's order, it may not continue to avail itself of the 30day extension.
- 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 <u>Regulatory Notice 12-11</u> (Supplemental FOCUS Information) (February 2012).
- 8. See <u>Regulatory Notice 16-11</u> (Supplemental FOCUS Information) (April 2016).
- See <u>Regulatory Notice 14-43</u> (SEC Approves Supplemental Inventory Schedule) (October 2014).
- 10. See Information Notice 6/3/21 (Redesigned eFOCUS System and SEC Security-Based Swap Reporting Requirements; Revised Supplemental Inventory Schedule).
- See <u>Regulatory Notice 21-31</u> (FINRA Establishes New Supplemental Liquidity Schedule) (September 2021).

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