

Information Notice

FINRA Entitlement Program Change

New Firm Requirement to Designate a Super Account Administrator

Executive Summary

Beginning March 29, 2010, FINRA is introducing changes to the Entitlement Program, including a new Super Account Administrator (SAA) role that will enable organizations to create account administrators and user accounts, as well as manage their own access to FINRA systems. The FINRA Entitlement Program provides authorized users a single user ID and password to access FINRA regulatory systems. See Attachment A for a list of FINRA systems and applications that participate in the Entitlement Program.

FINRA will implement the SAA role in phases from March 29, 2010, through early 2011. FINRA will notify firms via email of their SAA designation windows and provide instructions approximately six weeks prior to their designation due dates.

Questions concerning this *Notice* should be directed to Mary Ann Shaw, Director, Registration Operations, at (240) 386-4806.

Questions regarding the SAA or Entitlement Program should be directed to the Gateway Call Center at (301) 869-6699.

March 24, 2010

Suggested Routing

- Compliance
- Legal
- Operations
- Registration
- Senior Management

Key Topics

- Entitlement Program
- FINRA Systems and Applications

Background and Discussion

Under FINRA's current Entitlement Program, firms must rely upon FINRA for the creation and maintenance of all account administrators. For instance, firms must complete and submit a form (the FINRA Account Administrator Entitlement Form (AAEF)) for each individual who will be the firm's primary or alternate account administrator and for each FINRA application that firm needs to use. Moreover, firms must make changes to existing account administrators by submitting another form (an entitlement modification form) to FINRA.

With the implementation of the SAA, firms will use just one form for both the creation and modification of an SAA account. The SAA will have the ability to create, modify and delete account administrators for the firm, as well as manage his or her own access to FINRA applications. Both the SAA and account administrators will be able to create, modify or delete user accounts. Additionally, account administrators will no longer be distinguished as a "primary" or "alternate." Individuals with existing user accounts will continue to be able to access the applications to which they are entitled.

This streamlined program requires that firms designate one SAA for each firm with an organization ID/CRD number. In the case of firms with affiliates, the same SAA may be designated for each affiliate. The SAA must be either employed by or registered with the firm and, given the scope of the SAA's responsibility for maintaining the organization's entitlement privileges to applications, FINRA recommends that the firm designate a senior member of the firm's management team. Please note that, while a service provider is not permitted to be designated as an SAA, a service provider may continue to be an account administrator for a firm.

Another major change that FINRA will incorporate into the program is an online certification process. This new process will require a firm's SAA to periodically review the firm's user accounts and certify on behalf of the firm that all designated users should retain their authorization. FINRA will notify SAAs when online certification will commence.

FINRA will transition organizations to the SAA entitlement model in phases from late March 2010 through first quarter 2011. FINRA will notify firms via email of their SAA designation windows, along with instructions and access to the SAA Entitlement Form, approximately six weeks prior to each firm's SAA designation due date. The emails will be sent to account administrators, chief compliance officers and executive representatives.

Attachment A

Firm Systems/Applications

The following FINRA systems and applications participate in the Entitlement Program:

- eAnalytics
- eFocus
- FINRA Waiver Forms
- IARD
- New Member Application (NMA)
- NYSE Rule 407A Form
- Order Audit Trail System (OATS)
- Regulation Filing Applications
 - Central Review Group Request (CRG)
 - Customer Margin Balance Form
 - Firm Clearing Arrangement Form
 - Information Request Forms
 - Reg-17a-11 Financial Notification
 - Reg-2711 – Annual Attestation of Compliance
 - Reg-3012 Claim for Exception
 - Reg-Advertising
 - Reg-Blue Sheets
 - Reg-Disclosure Events & Complaints
 - Reg-FINRA Contact System (FCS)
 - Reg-Insite Firm Data Filing
 - Reg-Market Volatility
 - Reg-Short Position Reporting
 - TRACE New Issue Form
 - TRACE Order Form
- Report Center
- REX – Regulation T & 15C3-3 Extensions
- Secure Request Manager
- Web CRD
- Web Information Request (IR)