The CRD Registration Deficiency Tracking Program in CRD monitors individuals that have applied to become a registered representative or investment adviser representative and have a Deficient registration status. A Deficient status represents an agent that is not approved to conduct securities business, and many deficiencies must be resolved within a specific timeframe. This guide provides information on how firms can monitor this process.

**IMPORTANT NOTE:**

All classic CRD features should now be accessed through FINRA Gateway, the new FINRA reporting and compliance platform. This new system is designed to focus on compliance functions, such as research, reporting and responding to requests, rather than focusing on the specific system you would access to fulfill your requirements.

If you have any questions or feedback regarding the transition to FINRA Gateway, please contact FeedbackFINRAGateway@finra.org.

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Logging in Through FINRA Gateway

Beginning in Summer 2020, the new FINRA Gateway will become the primary method for accessing FINRA systems. To access FINRA Gateway:

1. Go to https://gateway.finra.org, and
2. Enter your existing CRD user ID and password.

Once you have successfully logged into FINRA Gateway, you can navigate to classic CRD using the Quick Links menu on the lower-left. Select Classic CRD from the list of links and then follow along with the rest of this guide.
Reviewing Individual Deficiencies

1. From the CRD Site Map, click Individual Search.
2. Enter search criteria.
3. Click Search.
4. From the View Individual navigation bar, click Deficiencies.

5. Click on the Firm Name hyperlink in the Deficiencies With Current Employers section to view the Deficiencies.

NOTE: To view deficiencies held with previous firms, click on the Firm Name hyperlink in the Deficiencies with Prior Employers section.
Current Individual Deficiencies Notice Queue

1. From the Individual column on the CRD Site Map, click the **Current Individual Deficiencies** hyperlink.
2. Select the radio button beside the type of deficiency that is to be reviewed. Only one radio button may be selected. To see all individual deficiencies within a firm, select the **All** radio button.

3. Click **Display Queue**.
4. Click the **Individual CRD** number hyperlink to open the individual's record. Individuals with more than one deficiency will appear multiple times in the queue.

**NOTE:** Clicking the Registration Category (**Reg Cat**) hyperlink will open a separate browser containing the individual’s deficiency details.
**Deficiencies List:** The table below displays deficiencies that will cause a registration to expire if not resolved, along with the number of days granted to resolve each deficiency.

<table>
<thead>
<tr>
<th>Deficiency That Will Cause a Registration to Expire</th>
<th>Number of Days</th>
<th>Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dual Registration Deficiency</td>
<td>90</td>
<td>Applies when an individual is Deficient for dual registration. The registration status will change to Purged, UNLESS it is a Mixed Dual deficiency, that is to say, the individual is an AG with one firm and an RA with another. Mixed Dual deficiencies will not receive a status of Purged.</td>
</tr>
<tr>
<td>Funds Deficiency</td>
<td>90</td>
<td>Applies when a registration is deficient due to insufficient funds for a firm.</td>
</tr>
<tr>
<td>Fingerprint Deficiency</td>
<td>90</td>
<td>Applies when an individual is required to submit a fingerprint card to FINRA and has been deficient. This deficiency does not apply to Investment Adviser Representatives.</td>
</tr>
<tr>
<td>AR Registration</td>
<td>180</td>
<td>Applies when an individual requests an AR position and the individual is already approved in another capacity, or when the individual requests another position while holding an approved AR position. This deficiency does not apply to Investment Adviser Representatives.</td>
</tr>
<tr>
<td>FA Registration</td>
<td>90</td>
<td>Applies when an individual requests an FA position and the individual is already approved in another capacity, or when the individual requests another position while holding an approved FA position. This deficiency does not apply to Investment Adviser Representatives.</td>
</tr>
<tr>
<td>Exam Deficiency</td>
<td>180</td>
<td>Applies when an individual has been deficient for 180 days. At this point, the firm has 5 days to reschedule an exam window. If the exam is not rescheduled the individual's registration will purge.</td>
</tr>
<tr>
<td>CE Inactive Deficiency</td>
<td>180</td>
<td>Applies when an individual does not complete their CE session within the appropriate time frame, and therefore becomes CE Inactive.</td>
</tr>
<tr>
<td>Prerequisite Deficiency</td>
<td>180</td>
<td>Applies if an individual holds a position that requires a prerequisite position, and the individual does not qualify for that prerequisite position. <strong>NOTE:</strong> If the agent currently has an exam window open to satisfy that prerequisite position, the registration status will not change to Purged. This deficiency does not apply to Investment Adviser Representatives.</td>
</tr>
</tbody>
</table>
Purged Registration Status

When a deficient registration request exceeds the time limit, the system will change the registration status to Purged. (See the following page for guidance on viewing Purged individual registrations.)

When the individual's last registration request purges, the system will NOT immediately close the firm association. A firm will have up to 120 days to file a Form U4 Amendment to re-request the registration of an individual with a Purged registration status. The firm will be assessed appropriate fees for the registration(s) selected on the Form U4 Amendment.

- If, after 120 days, no Form U4 Amendment has been filed for the individual and the individual only has registration statuses of Purged, the firm association will be closed. The registration will change from a Purged status to a registration status of Termed Without Registration (T_NOREG).

- If the firm then wishes to reinstate the individual, a new Form U4 filing must be submitted for the individual.

Individuals that have a Purged registration status and at least one Approved registration status will not have a firm association closed, unless the firm submits a Form U5 for the individual.

- In instances such as this, the firm may re-request previously Purged registration by submitting a Form U4 Amendment filing.

- Applicable registration fees will be assessed for registrations that are re-requested.

NOTE: Not all Deficient registration statuses will automatically be assigned a Purged status. The following deficiencies will NOT automatically be changed to a registration status of Purged.

- FINRA Deficiencies
- Disclosure Review Deficiencies
- Foreign Deficiencies
- Pending Firm Approval and Firm Suspended Deficiencies
Purged Individual Registrations Notice Queue

1. From the Individual column on the CRD Site Map, click on the **Purged Individual Registrations** hyperlink.
2. Select a radio button to identify the search criteria.
3. Click **Display Queue**.

4. Click the **Individual CRD** number hyperlink to display the individual's record. Individuals with more than one Purged registration status will appear multiple times in the queue.

**NOTE:** Clicking the Registration Category (**Reg Cat**) hyperlink will open another browser window to view the details of the deficiency that caused the registration status to purge.