FINRA Contact System Annual Verification Quick Reference Guide

Overview
Firms use the FINRA Contact System (FCS) to report the names of their Executive Representatives and other important contacts. FINRA uses FCS to deliver important communications and notices to the appropriate persons at member firms.

Accordingly, FINRA member firms are required to review and update, where necessary, contact and other related information for the specific areas on an annual basis. To ascertain that the firm reviews its contact information annually, FINRA requires firms to complete an annual verification process in FCS. The annual verification must be completed within 17 business days after the end of each calendar year, pursuant to FINRA Rule 4517.

The purpose of this guide is to instruct you how to perform the annual verification.

Please note that you must complete steps 1 through 7 in their entirety in order complete your review.

Logging In
1. Login to Firm Gateway: https://firms.finra.org/fcs.
2. Enter your FINRA User ID.
3. Please read the FINRA Privacy Statement, which appears in the main window and select the "I Agree" button.
4. Enter your Password and select the "Continue" button.
Performing Annual Verification

During the Annual Verification period, FCS displays a ‘Due’ flag, on the Annual Review tab until the Annual Verification is complete. Additionally, FCS is defaulted to display the Annual Review page first, until the Annual Verification is complete.

5. Review the contact information for each person.

6. Before performing the verification determine if:
   - **contact information needs to be updated** – Select the name of the contact next to the role you wish to update. The Contacts page will display. Select “Edit”, update the contact’s information and select “Save.” To return to the Annual Verification select the “Annual Review” tab from the top of the page.
   - **the Role needs to be associated with a different person** – Select the “Replace” link under the Actions column. The Replace a Contact pop up window will display. Select a contact from the list of Eligible Contacts and select “Replace” again. The newly assigned contact will display on the Annual Review page. Review the newly assigned contact’s information is correct and, if necessary, update.
   - **a role does not have a contact associated with it**, an “Assign” link will display. To associate a contact to the role, select the “Assign” link. The Assign a Contact pop up window will display. Select a contact from the list of Eligible Contacts and select “Assign” again. The newly assigned contact will display on the Annual Review page.
Completing Annual Verification

**Note:** Review all Roles and Contact Information prior to verifying. Once the Annual verification has been submitted by the firm, there is no way to undo the submission.

7. **To complete the review and verification,** enter your name in the text box next to “I verify that the contact information below is correct and complete.” Then select the “**Verify**” button.
   - If required contact information is incomplete or a required Role is unassigned, the following error message will display: “All errors must be corrected prior to verifying the Annual Review.”
   - If all the required contact information is provided, the following pop up message will display: “Your firm’s Annual Review has been submitted.”
Once verified, the links under the Actions column will no longer display and the page will become read-only. Additionally, the ‘Status Date’ column will display the date the Annual Verification was submitted and the ‘Status’ column will be updated to:

- “Submitted On Time” – if the verification was completed during the first 17 business days of the calendar year.
- "Submitted-Late" – if the verification was completed after the first 17 business days of the calendar year.

Once the Annual Verification has been submitted, there is no way to undo the submission. Any other changes to contacts must be made on the Roles page which you can access by selecting, the “Roles” tab at the top of the page. Further, changes made after the Annual Verification is submitted will not display on the Annual Review page.
FCS Annual Verification Frequently Asked Questions

Q: When must the Annual Verification be completed?
A: The Annual Verification must be completed within the first 17 business days of the calendar year. If for some reason the firm was unable to accomplish this during the review period, the firm should still complete the annual verification.

Q: Is there a rule requiring my firm to review and update all contact information required by FCS?
A: Yes, FINRA Rule 4517 requires firms to:
   - update all contact information required by FINRA via FCS promptly upon any material change;
   - review and verify contact information annually; and
   - comply promptly with any request for contact information.

   The mandatory annual verification must be completed within 17 business days after the end of each calendar year. For more information please see FINRA Rule 4517.

Q: The contact information for a contact currently associated to a role needs to be updated. How can I update the information?
A: The Contact’s name is a link to their contact information in FCS. Selecting the contact’s name will bring you to the Contacts page, where you can update the contact information.

Q: How do I know I completed the Annual Verification?
A: The Annual Review page will become read-only and the status in the ‘Status’ column will be updated to:
   - "Submitted On Time" – if the verification was completed during the first 17 business days of the calendar year; or
   - "Submitted-Late” – if the verification was completed after the first 17 business days of the calendar year.

Q: Where can I find information on prior Annual Verifications submitted by my firm?
A: One of the reports available in the Reports tab of FCS is the Annual Review Report. The Annual Review Report provides the Contacts and their assigned roles at the time of the Annual Verification. To view the details, select the review period from the drop down menu.

Q: I have more questions on the FINRA Contact System, who should I contact?
A: You may call the Gateway Call Center at (301) 869-6699 (8 a.m. – 8 p.m., ET, Monday – Friday) or send an email to fcs@finra.org.