

Information Notice

2018 and First Quarter of 2019 Report Filing Due Dates:

Annual Audit; FOCUS; Form Custody; Supplemental Statement of Income (SSOI); Supplemental Schedule for Derivatives and Other Off-Balance Sheet Items (OBS); and Supplemental Inventory Schedule (SIS)

Summary

FINRA reminds firms of their Annual Audit, Financial and Operational Combined Uniform Single (FOCUS), Form Custody, and supplemental FOCUS Report filing obligations. This *Notice* provides the due dates for filings that are due in 2018 or in the first quarter of 2019. All filings submitted to FINRA must be made electronically through FINRA's Firm Gateway.

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

All filings must be received by FINRA by their required due dates to avoid specified fees as set forth in Schedule A to FINRA's By-Laws and to avoid suspension of FINRA membership.

Questions regarding this *Notice* should be directed to your firm's Regulatory Coordinator.

November 30, 2017

Suggested Routing

- ▶ Compliance
- ▶ Legal
- ▶ Operations
- ▶ Regulatory Reporting
- ▶ Senior Management

Key Topic(s)

- ▶ Annual Audit Report Filings
- ▶ FOCUS Report Filings
- ▶ Form Custody Filings
- ▶ Supplemental Inventory Schedule
- ▶ Supplemental Schedule for Derivatives and Other Off-Balance Sheet Items
- ▶ Supplemental Statement of Income

Referenced Rules and Notices

- ▶ Regulatory Notice 11-46
- ▶ Regulatory Notice 12-11
- ▶ Regulatory Notice 14-43
- ▶ Regulatory Notice 16-11
- ▶ Regulatory Notice 17-07
- ▶ SEA Rule 17a-5

Background

Annual Audit Report

Firms must submit their annual audit reports to FINRA in electronic form.¹ Pursuant to SEA Rule 17a-5(d)(6), firms must also file the report at the regional office of the SEC in which the firm has its principal place of business and the SEC's principal office in Washington, DC. Members are reminded that the SEC has a process for electronic filing of annual audit reports, in lieu of filing in paper form, which the SEC updated in January 2017.²

Rule 17a-5(d)(6) requires firms that are members of Securities Investor Protection Corporation (SIPC) to file the annual audit report with SIPC. Members are reminded that in August 2017, SIPC and FINRA announced an agreement designed to ease reporting burdens and compliance costs for firms.³ Pursuant to the agreement, when a firm that is a SIPC member files an annual audit report through FINRA's Firm Gateway on or after September 1, 2017, 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 Audit Reports

| Period Ending | Due Date |
|--------------------|-------------------|
| November 30, 2017 | January 29, 2018 |
| December 31, 2017 | March 1, 2018 |
| January 31, 2018 | April 2, 2018 |
| February 28, 2018 | April 30, 2018 |
| March 31, 2018 | May 30, 2018 |
| April 30, 2018 | June 29, 2018 |
| May 31, 2018 | July 30, 2018 |
| June 30, 2018 | August 29, 2018 |
| July 31, 2018 | October 1, 2018 |
| August 31, 2018 | October 30, 2018 |
| September 30, 2018 | November 29, 2018 |
| October 31, 2018 | December 31, 2018 |
| November 30, 2018 | January 29, 2019 |
| December 31, 2018 | March 1, 2019 |

FOCUS Reports

Firms must submit their FOCUS Reports electronically through the eFOCUS System available via the FINRA Firm Gateway. For information about completing the FOCUS Report, please see the [FOCUS Report submission guidance](#).

Monthly and Fifth⁴ FOCUS Part II/IIA Filings

| Period Ending | Due Date |
|-------------------|--------------------|
| January 31, 2018 | February 26, 2018 |
| February 28, 2018 | March 23, 2018 |
| April 30, 2018 | May 23, 2018 |
| May 31, 2018 | June 25, 2018 |
| July 31, 2018 | August 23, 2018 |
| August 31, 2018 | September 26, 2018 |
| October 31, 2018 | November 27, 2018 |
| November 30, 2018 | December 26, 2018 |

Quarterly FOCUS Part II/IIA Filings

| Quarter Ending | Due Date |
|--------------------|------------------|
| December 31, 2017 | January 25, 2018 |
| March 31, 2018 | April 24, 2018 |
| June 30, 2018 | July 25, 2018 |
| September 30, 2018 | October 24, 2018 |
| December 31, 2018 | January 25, 2019 |

Annual Schedule I Filings

| Period | Due Date |
|--------|------------------|
| 2017 | January 25, 2018 |
| 2018 | January 25, 2019 |

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, 2017 | January 25, 2018 |
| March 31, 2018 | April 24, 2018 |
| June 30, 2018 | July 25, 2018 |
| September 30, 2018 | October 24, 2018 |
| December 31, 2018 | January 25, 2019 |

Supplemental Statement of Income (SSOI)

Firms must file the SSOI on a quarterly basis.⁵

SSOI Filings

| Quarter Ending | Due Date |
|--------------------|------------------|
| December 31, 2017 | January 30, 2018 |
| March 31, 2018 | April 27, 2018 |
| June 30, 2018 | July 30, 2018 |
| September 30, 2018 | October 29, 2018 |
| December 31, 2018 | January 30, 2019 |

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 FINRA member firms that self-clear their proprietary transactions or clear transactions for others or carry customer accounts; and (2) all other FINRA 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.⁶ 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 [Derivatives and Other Off-Balance Sheet Items Schedule \(OBS\)](#) page.

Form OBS Filings

| Quarter Ending | Due Date |
|--------------------|------------------|
| December 31, 2017 | February 1, 2018 |
| March 31, 2018 | May 1, 2018 |
| June 30, 2018 | August 1, 2018 |
| September 30, 2018 | October 31, 2018 |
| December 31, 2018 | February 1, 2019 |

Supplemental Inventory Schedule (SIS)

The SIS must be filed by a firm that is required to file FOCUS Report Part II, 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.⁷ 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.

SIS Form Filings

| Month Ending | Due Date |
|--------------------|-------------------|
| December 31, 2017 | January 30, 2018 |
| January 31, 2018 | March 1, 2018 |
| February 28, 2018 | March 28, 2018 |
| March 31, 2018 | April 27, 2018 |
| April 30, 2018 | May 29, 2018 |
| May 31, 2018 | June 28, 2018 |
| June 30, 2018 | July 30, 2018 |
| July 31, 2018 | August 28, 2018 |
| August 31, 2018 | October 1, 2018 |
| September 30, 2018 | October 29, 2018 |
| October 31, 2018 | November 30, 2018 |
| November 30, 2018 | December 31, 2018 |
| December 31, 2018 | January 30, 2019 |

FINRA Gateway and Entitlements

Firms are reminded that they must use their current FINRA entitlement user ID and password to access the Firm Gateway. Questions regarding access to the Firm 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.

Endnotes

1. See [Regulatory Notice 11-46](#) (Annual Audit Reports: FINRA to Require Electronic Submission of Annual Audit Reports) (October 2011).
2. See [Electronic Filing of Broker-Dealer Annual Reports](#) on the SEC website; see also [Regulatory Notice 17-07](#) (Updated SEC No-Action Guidance and Instructions on Electronic Filing of Broker-Dealer Annual Reports) (February 2017).
3. See FINRA news release, [SIPC and FINRA Streamline Reporting Process for Broker-Dealers](#) (August 1, 2017).
4. 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.
5. See [Regulatory Notice 12-11](#) (Supplemental FOCUS Information) (February 2012).
6. See [Regulatory Notice 16-11](#) (Supplemental FOCUS Information) (April 2016).
7. See [Regulatory Notice 14-43](#) (SEC Approves Supplemental Inventory Schedule) (October 2014).