

## Regulatory Element

1. In order to increase the timeliness of Regulatory Element content, the CE Council is considering recommending moving to an annual requirement. Although the transition would reduce the amount of content included in a session to approximately one-third of the current program, the increased frequency could result in increased effort required to monitor participation. What are the potential impacts of this transition to firms? **I think it is a great idea**

2. The CE Council has discussed with FINRA possible enhancements to the CRD system and the Financial Professional Gateway. Would enhanced reporting and automated notification functions help mitigate the additional efforts required to monitor participation of an annual Regulatory Element requirement? What other system enhancements would firms find helpful? **Good**

3. The CE Council is considering narrowing the focus of the Regulatory Element to rule changes and significant regulatory issues. Does this seem like an appropriate focus? **Yes** Are there other topics that should be included within the Regulatory Element? **No**

4. The CE Council is considering adoption of a modular structure in place of the current Regulatory programs. Does this seem like a good way to increase the relevance of the Regulatory Element content? Are there concerns with determining relevance of topics based on registrations held, keeping in mind this will have a de minimis effect on the time required to complete the annual course? **I like this**

5. The CE Council is exploring the possibility of publishing the Regulatory Element topics for the coming year in advance of introducing such topics. If this information were available, would firms factor it into their Firm Element training plans? **Yes** How much detail would be necessary for it to be useful? **Topic and relevant items** How early would the CE Council need to publish the information to allow for timely alignment with Firm Element planning activities? **One year preferably, however if something becomes an issue I would like FINRA to act on it ASAP**

## Firm Element

6. Is the current Firm Element Advisory (FEA) useful? Do firms reference the FEA when planning their training programs? Which aspects of the FEA are most helpful? Are there other resources the CE Council should provide to help firms meet their Firm Element requirements? **We have quarterly compliance**

meeting and we have regular items that we review each quarter, then we have firm level issues that we review. It would be helpful if in January in conjunction with Regulatory CE we could get a list of relevant subjects that FINRA would like us to review with reps.

7. How much Firm Element training does the typical covered person receive? **About 30 minutes quarterly.** Are electronic and in-person courses the standard format for delivering Firm Element training? Do most courses include an assessment component? **We do live and video with a test for those that can't attend.** What other learning activities do firms commonly use to meet Firm Element requirements? **Must Read and respond emails for urgent items I also do videos that are sent to reps.**

8. Is Firm Element generally limited to covered persons? **All Firm personnel.** Do firms typically offer similar amounts of training to registered persons who are not covered persons? Do firms offer similar training opportunities to unregistered persons? Should the Firm Element requirement apply to all registered persons? What types of training do covered persons undertake that should be included as Firm Element training? **We train everyone the same.**

9. How could the CE Council communicate reasonable expectations for amounts of Firm Element without introducing an onerous process? **Understand that you have three different levels of firms (small, medium and large) remember that one size does not fit all.** Are there other ways to ensure firms provide adequate training to securities professionals? **A portal sounds good.**

10. Aside from Firm Element, what are the most significant regulatory training courses used by firms? Do firms include these other requirements as part of their Firm Element training programs? **We do a video quarterly with a live audience and include a mandatory test to prove they watched it. We only use FINRA Firm element CE when we feel it is appropriate for a rep.**

11. Do most firms maintain training programs to ensure associated persons meet the requirements of non-regulatory credentialing programs? Which credentialing programs have the most significant impact on firm training programs? Do firms include these training requirements within their Firm Element training plans? Are there credentialing programs with which the CE Council should consider establishing formal reciprocity agreements? **What do mean by credentialing sometimes it would be helpful if you used less jargon.**

12. How often do firms use content from third-party training providers to meet their Firm Element requirements? Would a centralized content catalog with offerings from multiple providers be beneficial for the industry? **Not for us, if we use it we use FINRA's**

#### Maintaining Qualification Status Post Termination

13. Should the CE Council pursue a recommendation to allow previously registered individuals to maintain their qualification status while away from the industry? Does a CE program seem like an appropriate way to accomplish this? **Yes definitely**

14. If the CE Council recommended introducing a CE program that allowed individuals to maintain their qualification status while outside the industry, how much CE would be sufficient? **Quarterly**

15. If the CE Council recommended introducing such a program, should it impose an experience requirement for individuals to be eligible? **Yes** If the CE Council recommended establishing a minimum duration of prior registration, what would be a reasonable requirement? **5 years**

16. Should there be a limit to how long a previously registered individual could maintain their qualification status via the CE program under consideration? **4 years is plenty.** If so, what duration is appropriate?

17. Should the program allow previously registered individuals to maintain their qualification status while associated with a firm but working in a capacity that does not require registration? **yes** How would this interact with the expanded opportunity for an associated person to hold a permissive registration? **Should'nt**

18. How important is maintaining the two-year termination rule if individuals are able to maintain qualification status while away from the industry? **I think if they are doing annual Regulatory CE and quarterly Firm Element then it should keep them qualified.** Is the opportunity for individuals to complete lapsed CE when re-registering within two years of termination a sufficient replacement for the two-year termination rule? **See above**

## General Questions

19. In developing a specific recommendation to change the industry CE requirements, what are the most important issues for the CE Council to consider? **That individuals maintain an appropriate level of knowledge of industry rules.**

20. Are there alternative approaches, other than the ideas discussed here, that the CE Council should consider? What are the relative benefits and costs of any alternative approach? **Current levels of cost are adequate.**

Richard J. Carlesco Jr. LUTCF

IBN Financial Services, Inc.

8035 Oswego Rd.

PO Box 2365

Liverpool, NY 13089

315-652-4426 or 877-492-9464

Fax 315-652-1035

<http://www.ibnfinancialservices.com> [ibnfinancialservices.com]

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