

FINRA Contact System Contact Management Quick Reference Guide

Overview

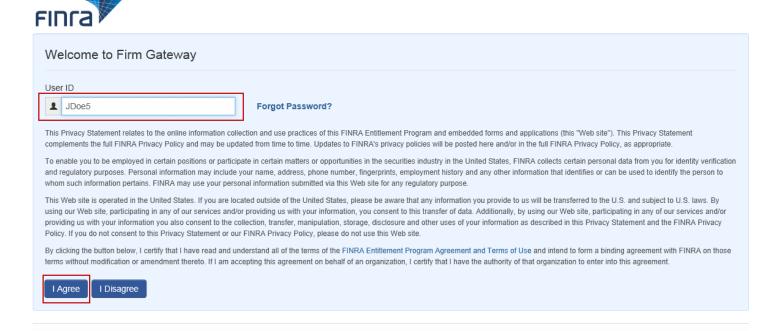
Firms use FINRA Contact System (FCS) to report the names of their Executive Representatives and other important contacts. FINRA uses FCS to deliver important communications and notices to the appropriate persons at firms.

Accordingly, FINRA firms are required to review and update, where necessary, contact and other related information promptly, but no later than 30 days following any change in such information and on an annual basis. To ascertain that the firm reviews its contact information annually, FINRA requires firms to complete an annual review process in FCS. The annual review must be completed within 17 business days after the end of each calendar year, pursuant to NASD Rule 1160.

This guide instructs you on how to add, edit and delete contacts.

Logging In

- 1. Login to Firm Gateway: https://firms.finra.org/fcs.
- 2. Enter your FINRA User ID.
- Please read the FINRA Privacy Statement, which appears in the main window and select the "I Agree" button.



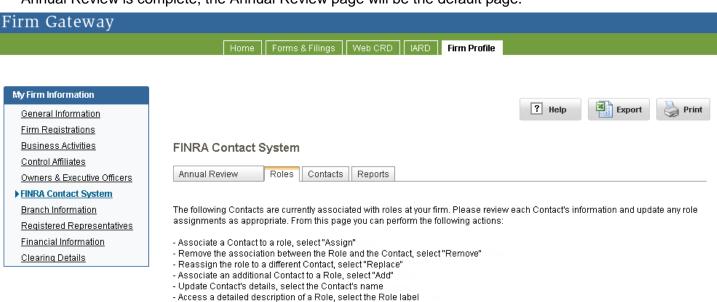
Do NOT bookmark this page or add it to your favorites. If you would like to create a bookmark or add this application to your favorites, please create the bookmark or add it to your favorites after successfully logging in Privacy | Legal | Terms & Conditions

If you are experiencing any difficulties logging into the system, please contact your Administrator for assistance. If you are a Super Account Administrator, contact the Gateway Call Center at 301-869-6699 for Assistance

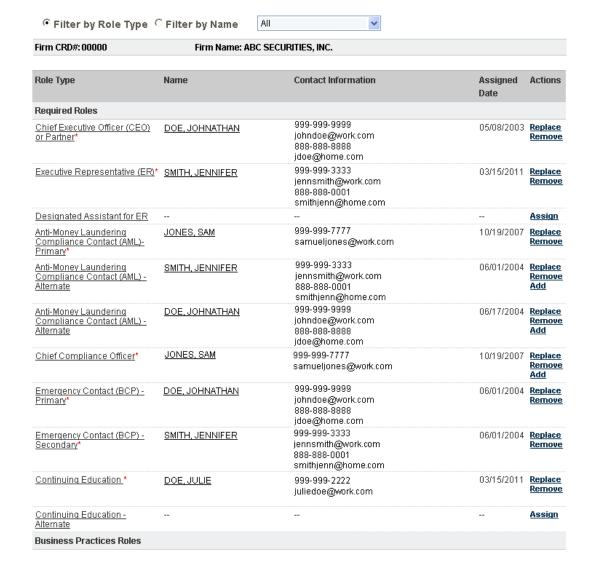
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4. Enter your Password and select the "Continue" button.

5. The FINRA Contact System Roles page displays. **Note:** During the Annual Review period, and until the Annual Review is complete, the Annual Review page will be the default page.



Note: You can also filter this page by Role Type or Contact Name by selecting the appropriate radio button and viewing the dropdown.



Roles Tab

The Roles page is broken-down into the following <u>sections</u>: Required Roles, Business Practices Roles, System Roles, and Other Roles (if your firm is a member of the NYSE you will also see the NYSE Roles section). To review a specific section of roles, you can access the sections by scrolling down on the page or by selecting the section from the dropdown menu at the top of the page, next to the Filter options.

Note: You are required to provide a contact for each Role listed in the 'Required Roles' section <u>except</u> for the following which are optional:

- Designated Assistant for ER
- Anti-Money Laundering Compliance Contact (AML) Alternate and
- Continuing Education Alternate

Filtering the Roles page

There are two filter options on the Roles page: 'Filter by Role Type' or 'Filter by Name'. To change the filter option, select the desired radio button at the top of the page.

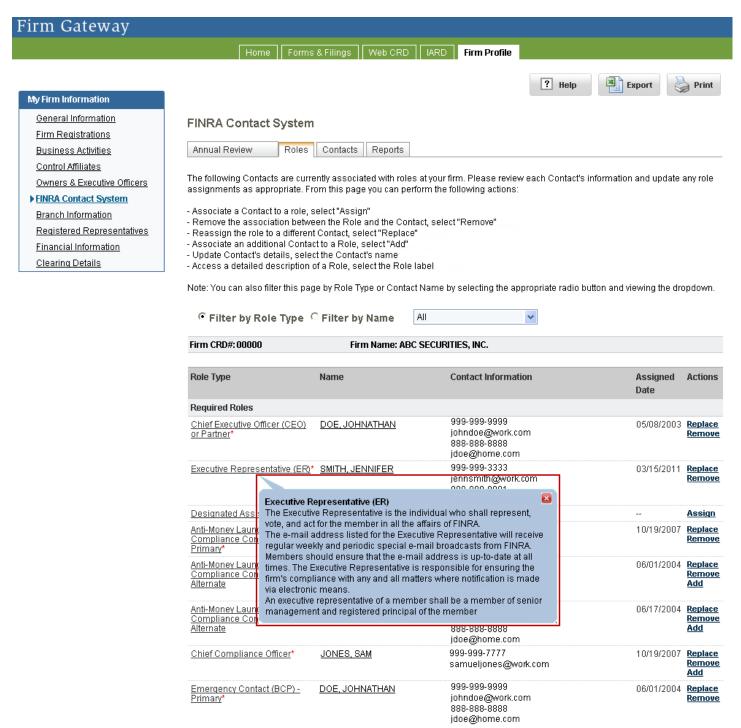
Filter by:

- Role Type: When filtered by Role Type, the Roles page displays a list of all roles in that role section in FCS. If a role has a Contact associated with it, the Contact's Name, primary phone number, secondary phone (when provided), primary email, secondary email (when provided), and the date the Contact became associated with the role will display.
- Name: When filtered by Name, the Roles page displays a list of the roles associated to a specific Contact, additionally the Contact's primary phone number, secondary phone (when provided), primary email, secondary email (when provided), and the date the Contact became associated with the role will display.

Role Descriptions

The Role name is a link to view the definition and the requirements of the role. There are two ways to view the definition of the role:

- Place your cursor over the role name to display a window with the definition. Once the cursor is moved away from the role name the definition no longer displays.
- Click on the role name to display a window with the definition. The definition will display on the screen
 until you select the close icon in the new window.



Actions

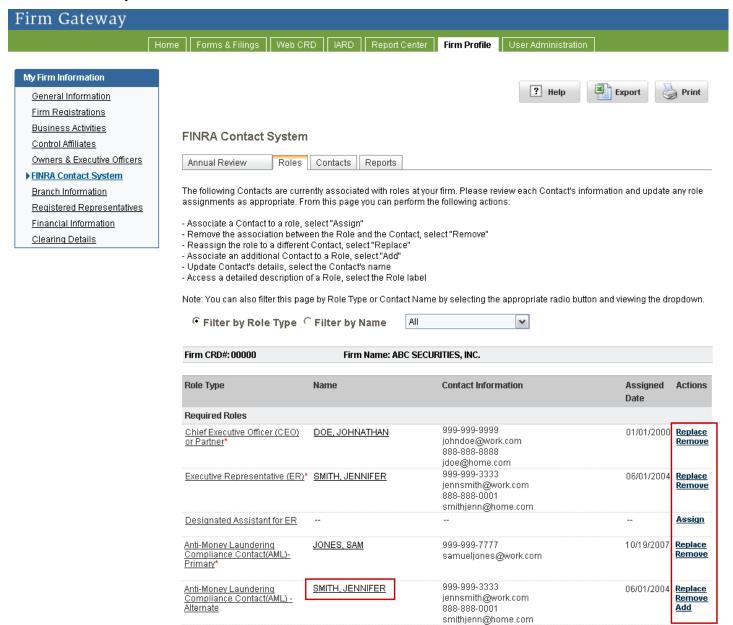
The action links appear in the 'Actions' column on the far right side of the page. If you do not have entitlement privileges to edit FCS, these links will not display.

From the Roles page you can:

- Add an individual to a role that allows more than one contact Select the "Add" link.
- Assign an individual to an empty role Select the "Assign" link.
- **Replace** the person associated with a Role Select the "**Replace**" link. By selecting replace you are completing two steps in one. Replace allows you to remove the individual's association to a role and assign a new individual to the role.

Note: When you select Add, Assign or Replace from the Roles page, a pop up window will display. From the pop up window, you will be given a list of individuals (eligible contacts) that meet the role requirements, to associate to the role. Select the appropriate Contact from the Eligible Contact list and select the Replace (Add or Assign) button to update the role association.

- **Remove** a particular individual's association with a Role Select the "**Remove**" link. By selecting remove you are NOT deleting the individual from FCS, it will only remove the individual's association with the Role. Additionally the role will be left with no individual assigned to it.
- **Update a contact's record** Select the Contact's name. The contact's name is a link to the Contacts tab where you can edit the Contact's FCS record.



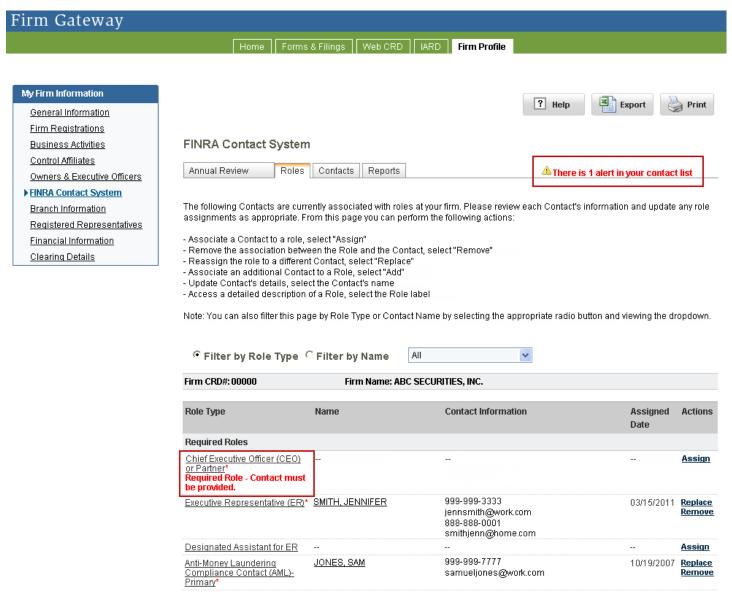
Alerts

If your firm has missing or incomplete information in FCS, there are alerts, which help you identify when information is incomplete or missing. At the top of each page in FCS, across from the tabs there is a running count of your firm's alerts.

The alerts under the role name provide details on what is needed.

- Required Role Contact must be provided. Displays when no contact is associated to a Required Role.
- Contact must be associated with the firm. Displays when the contact assigned to the role no longer has a Form U4 association with your firm.
- Contact must be a principal with the firm. Displays when the contact assigned no longer holds a
 principal license with your firm.
- Missing Information Alternate phone/email is required. Displays when the secondary contact information is missing for the Emergency Contact (BCP) Primary or Secondary contact.
- Missing Information Area of Primary Compliance Responsibility description is required.
 Displays when there are multiple CCOs and the Area of Primary Compliance Responsibility text is not provided.

In addition, alerts are also displayed on the Contacts tab. If there is missing or incomplete information within a Contact's record there will be a '...' image next to the Contact's name on the left hand side.



Contacts Tab

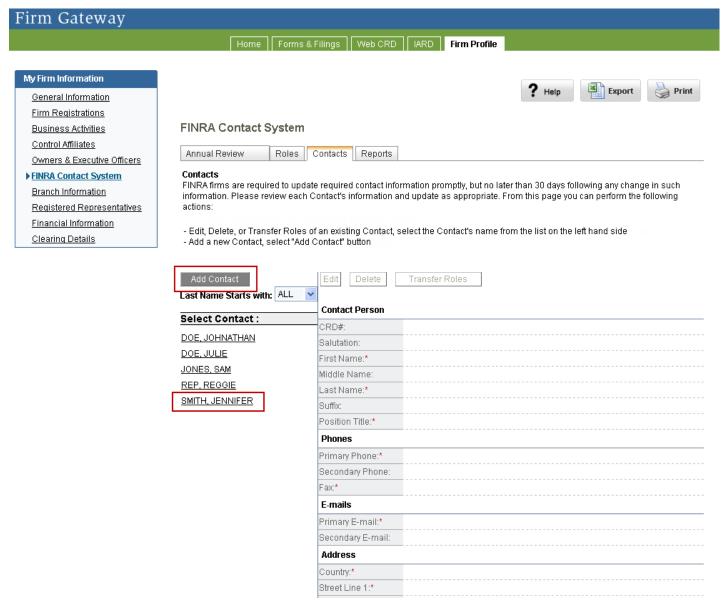
The Contacts page displays a list of all Contacts associated with your firm along with the roles with which they are associated and the date their contact information was last updated. The list of current Contacts can be filtered alphabetically, by last name, using the 'Last Name Starts with' dropdown.

From the Contacts page you can:

Add a new Contact to FCS – Select the "**Add Contact**" button. You must first indicate if the individual is Registered or Non Registered, and then provide the required contact information.

View an existing Contact's record – Select the Contact's name to view or make changes to their record. After selecting the Contact's name you can:

- Edit the record of an existing Contact Select the "Edit" button to make changes to the individual's FCS record.
- **Delete** the record of an existing Contact Select the "**Delete**" button to remove the Contact's record from FCS. Any roles currently assigned to the individual will be unassigned. You will still be able to view historical information regarding the individual's record in the Reports tab.
- Transfer Roles associated to the contact Select the "Transfer Roles" button to assign all or selected
 roles to a different Contact. Note: This option is only available when the contact is currently associated
 to a role.

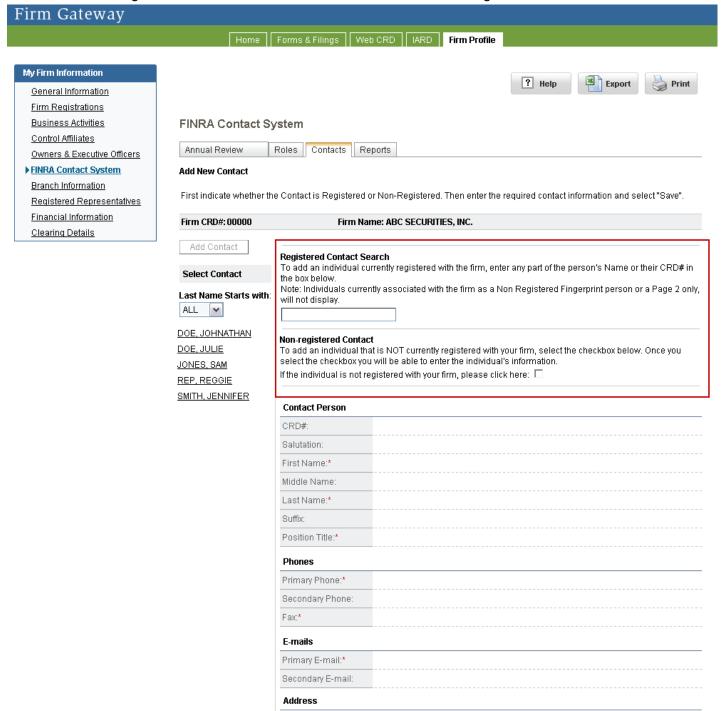


Add New Contact

Individuals listed as contacts are either Registered individuals, meaning they have a Form U4 on file with your firm, or they are Non Registered individuals, meaning they do not have a Form U4 on file with your firm.

Note: Individuals associated with your firm as a Non Registered Fingerprint person (NRF) or a Page 2 only person (Direct Owners/Executive Officers) are considered Non Registered individuals in FCS.

- 1. Select the "Add Contact" button.
- 2. Indicate whether the individual is Registered or Non Registered.
 - For Registered individuals enter either their name or CRD# in the box below 'Registered Contact Search.'
 - For Non Registered individuals select the checkbox below 'Non-registered Contact.'



3. Enter the required contact information.

Note: For Registered individuals the Last Name that displays is the information from Web CRD.

- 4. Select the "Save" button.
 - If all the required information is provided and complete, the system will save the information and display the Contact's record in read only mode.
 - If all the required information is not provided or incomplete the system will display the following message at the top of the page. 'Validation issues exist. You must correct all problems before you can save.' An error message will also appear next to the field where the issue is occurring.

Edit Contact

FINRA firms are required to update required contact information promptly, but no later than 30 days following any change in such information. To update an existing contact, fill in the missing or inaccurate values, select Edit.

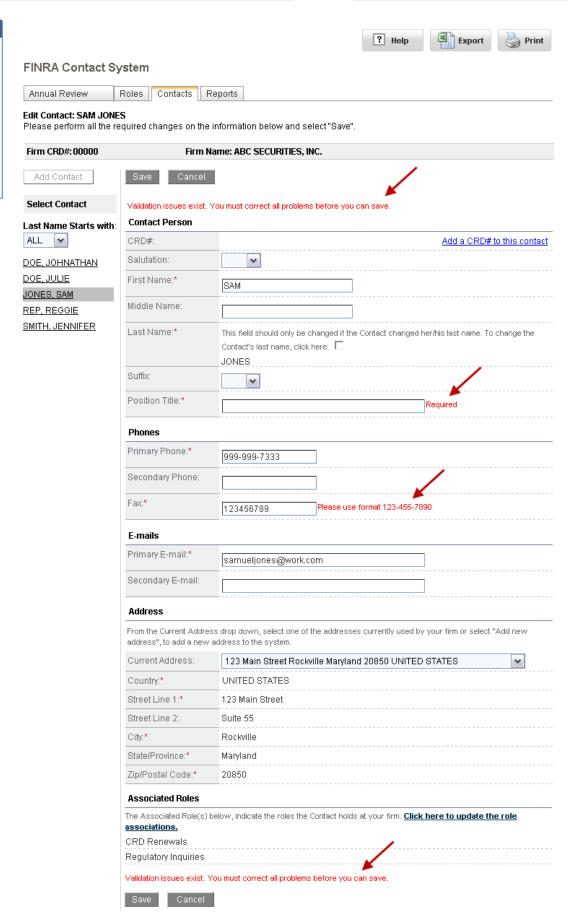
Note: You must create a new contact record for each individual. You may not change the name on a contact record unless the person's name was legally changed.

The steps to update a Contact's Last Name will be different depending on whether they are Registered or Non Registered.

- 1. Select the Contact's name, on the left hand side of the page.
- 2. Select the "Edit" button.
 - If the contact is Registered, the last name field (and CRD# field) will be read only and will not allow edits. The following text will display, 'To report a name change for this Contact person, please file a Form U4 in Web CRD.' If updates are needed to the Contact's last name they must be made in Web CRD. The changes made in Web CRD will be reflected in FCS in 24 hours.
 - If the contact is Non Registered, the last name field initially will not allow edits. You must select the checkbox next to, 'This field should only be changed if the Contact changed her/his last name. To change the Contact's last name click here.'
- **3.** Review the changes, then select the "Save" button.
 - If all the required information is provided and complete the system will save the information and the Contact's record will display in read only mode.
 - If required information is incomplete the system will display the following message at the top of the page. 'Validation issues exist. You must correct all problems before you can save.' An error message will also appear next to the field where the issue is occurring.







Edit Contact's Address

Each contact in FCS must have an address associated to their record. When their record is created they can either use one of the addresses being used by another Contact (listed in the dropdown) or create a new address. The addresses that display in the dropdown list are the addresses currently associated to a Contact at your firm. Once an address is no longer associated to any Contacts at your firm it will not display in the dropdown list. To change the Contact's address, complete the following steps:

- 1. Select the Contact's name, on the left hand side of the page.
- 2. Select the "Edit" button.
- 3. Click the dropdown button, in the 'Address' section.
- 4. Select either; "Add new address" or select one of the existing addresses from the dropdown list.
 - If add new address is selected you will be required to enter the address.
- 5. Select the "Save" button.

Edit a Contact's Area of Primary Compliance Responsibility

FCS will allow more than one contact to be associated to the role of Chief Compliance Officer (CCO). When multiple CCOs are listed, each CCO must provide a description of their primary compliance responsibilities. To add or edit the Area of Primary Compliance Responsibility description, complete the following steps.

- 1. From the Roles Tab, select the Chief Compliance Officer's name.
- 2. The Contacts page displays, select the "Edit" button.
- 3. Enter a description, using the textbox provided in the 'Area of Primary Compliance Responsibility' section.
- 4. Select the "Save" button.

Transfer Roles

The steps to Transfer Roles to another contact are slightly different depending on the number of roles the contact is associated to. **Note:** This option is only available when the contact is currently associated to a role.

- 1. Select the Contact's name, on the left hand side of the page.
- 2. Select the "Transfer Roles" button. The Transfer Role pop up window will display.
- 3. From the pop up window, select the Roles you wish to transfer.
 - If the contact is only associated to one role, this step does not apply and will not display.
- **4.** From the Eligible Contacts list, select a Contact.
 - If multiple roles are selected to transfer, the Eligible Contacts list will only display the Contacts that meet the criteria for all the roles selected.
- 5. Select the "Transfer" button.



Home Forms & Filings Web CRD IARD Firm Profile

My Firm Information General Information Firm Registrations Business Activities Control Affiliates Owners & Executive Officers FINRA Contact System Branch Information Registered Representatives Financial Information

Clearing Details

FINRA Contact System

Annual Review Roles Contacts Reports

? Help

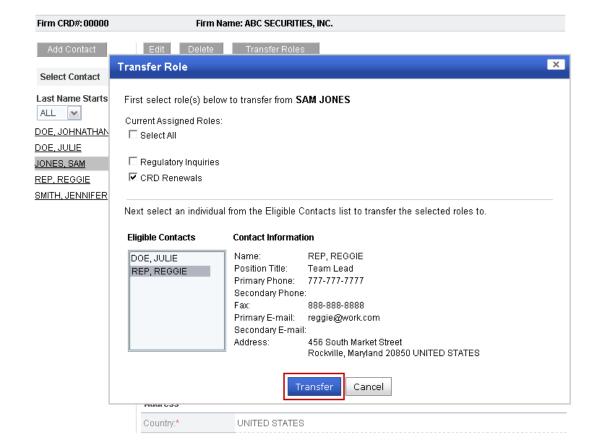
Print

Export |

Edit Contact: SAM JONES

From this page you can:

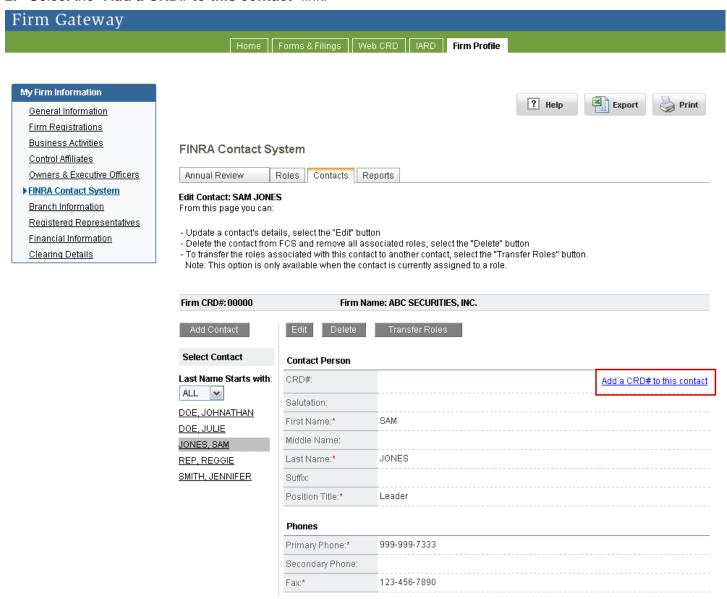
- Update a contact's details, select the "Edit" button
- Delete the contact from FCS and remove all associated roles, select the "Delete" button
- To transfer the roles associated with this contact to another contact, select the "Transfer Roles" button.
 Note: This option is only available when the contact is currently assigned to a role.



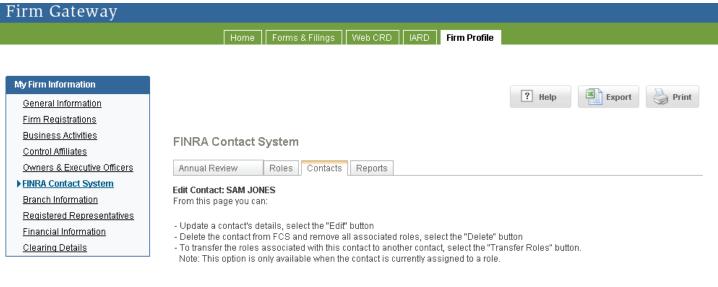
Add CRD number for an existing Contact

Individuals that were added to the Contact System as a Non Registered Contact can have their CRD# added to their FCS record, once they become registered with your firm. To add the individual's CRD # to their FCS record, complete the following steps:

- 1. Select the Contact's name, on the left hand side of the page.
- 2. Select the "Add a CRD# to this contact" link.



- 3. The Add CRD# to contact pop up window will display, enter the Contact's CRD number.
- 4. Select the "Add" button.
 - If the Contact's Last Name matches the Last Name in CRD the system will display the following message: 'Name in CRD: <Individual's Last Name First Name> Name in FCS <Individual's Last Name First Name>'
 - If the Contact's Last Name does not match the Last Name in CRD the system will display the following message: 'The Last Name in CRD <Individual's Last Name in CRD> and FCS <Individual's Last Name in FCS> do not match. Please re-enter the individual CRD# and click Add again.'
 - If the CRD number entered does not match a CRD number for an individual at your firm, the system will
 display the following message: 'The CRD# <Individual's CRD#> entered is not found.'





- 5. Select the "Add" button again.
- **6.** The Add CRD# to contact pop up window will display with a confirmation message 'The CRD# <Individual's CRD#> has been assigned to: <Individual's Last Name First Name>.'
- 7. Select the "OK" button.

Once the Contact's CRD# has been successfully added to their FCS record, the 'Add a CRD# to this contact' link will no longer display and the CRD# will display in Contact's record.

Reports Tab

There are four reports available in FCS. Reports are free of charge and can be requested at any time. The details of the report will display on the page and can either be printed or exported into an Excel spreadsheet. Note: In order to print or export the Reports you must have entitlement to edit FCS.

Report by Role - provides a list of the changes made to all roles or a specific role during a specified timeframe. You must provide the following search criteria; From Date, To Date and a Role. The From Date and To Date must be in the MM/DD/YYYY format.

• No results will be returned if no changes were made to the selected role during the specified timeframe.

Report by Name - provides a list of the changes made to a Contact's record during a specified timeframe. You must provide the following search criteria; From Date, To Date and a Name. The From Date and To Date must be in the MM/DD/YYYY format. You can enter the Contact's full name or a partial name.

• Results will only be returned for individuals that have been entered as Contacts in FCS and changes were made to the Contact during the specified timeframe.

<u>Snapshot Report</u> - provides a list of the contacts associated to all roles on the desired date. You must provide a date (MM/DD/YYYY).

<u>Annual Review Report</u> - provides a snapshot of your firms historical Annual Reviews (provides the Required Contacts, their assigned roles at the time of the Annual Review, and details regarding the completion of the Annual Review.) You must select an Annual Review Period from the dropdown.

Will only display once your firm is required to complete the Annual Review.

Requesting a Report

The steps to request each report are similar.

- 1. Select the radio button next to the desired report, on the left hand side of the page.
- 2. Enter the required criteria.
- 3. Select the "Go" button.



FCS Contact Management Frequently Asked Questions

Q: I just submitted a Form U4 for a new representative, now I want to add the person as a contact in FCS. Why doesn't the representative show up when I search for them?

A: Changes such as filing a new Form U4, last name change, addition of a principal license or approval of a principal license takes 24 hours to reflect in FCS.

Q: When I login I can see FCS but I can't make changes to the information. Why can't I make any changes? A: Check your entitlements, to edit FCS users must have the "Use" privilege for the Write entitlement. Please contact the SAA for your firm and ask to have your entitlement privileges updated.

Q: My firm is a sole proprietor who should I enter as my, "Secondary Emergency Contact?"

A: Rule 4370 requires all members designate two emergency contact persons.

The second emergency contact person should be an individual, either registered with another firm or nonregistered, who has knowledge of the member's business operations (e.g., the member's attorney, accountant, or clearing firm contact).

Q: Is there a rule requiring my firm to review and update all contact information required by the FINRA Contact System (FCS)?

A: Yes, NASD Rule 1160 requires firms to:

- update all contact information required by FINRA via FINRA Contact System (FCS) promptly upon any material change;
- review and verify contact information annually; and
- comply promptly with any request for contact information.

The mandatory annual review must be completed within 17 business days after the end of each calendar year. For more information please see Regulatory Notice 07-42.

Q: When I Replace, Add, or Assign a contact to a role, why don't all my firm's contacts display in the Eligible Contact list?

A: The Eligible Contact list will only display the contacts that meet the requirements for the selected role. For example, if you wanted to Replace your Executive Representative, the Eligible Contacts list would only display the contacts that are currently registered with the firm and currently hold a principal license with your firm.

Q: Why is my firm required to provide the Area of Primary Compliance Responsibility?

A: The Area of Primary Compliance Responsibility is required, for each Chief Compliance Officer (CCO), when the firm has more than one Chief Compliance Officer. For more information please see **FINRA Rule 3130.2**.

Q: I don't see the Business Mix section, was it moved to a different location?

A: The Business Mix section was removed from FCS and can now be found in the Business Activities section of Firm Profile.

Q: I have more questions about 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**.