

## Broker-Dealer Compliance “To Do” List for 2021

*Provided by Hardin Compliance Consulting LLC  
January 2021*

### Regulatory Deadlines for Broker-Dealers

Hardin Compliance Consulting compiled a list of regulatory requirements for broker-dealers. This list is not intended to be exhaustive, but it should help compliance officers set up their regulatory calendars for 2021.

#### January

- ✓ [FINRA Accounting Support Fee](#): Quarterly invoice to support the GASB budget. Based on the municipal securities the firm reported to the MSRB. De minimis firms (that owe less than \$25) will not receive an invoice. Invoices are sent to the firm via WebCRD’s E-Bill.
- ✓ [Customer Complaint Quarterly Statistical Summary](#): For complaints received during the 4<sup>th</sup> Quarter, 2020. FINRA Rule 4530 requires Firms to submit statistical and summary information regarding complaints received during the quarter by the 15<sup>th</sup> day of the month following the calendar quarter. **Due January 15, 2021.**
- ✓ [Final Renewal Payment](#): Full payment of your FINRA 2021 Final Renewal Statement is due **January 22, 2021.**
- ✓ [FINRA Contact System Annual Review](#): FINRA Rule 4517 requires Firms to review and, if necessary, update the necessary FINRA Contact System information within the first 17 business days of each calendar year. **Due January 25, 2021.**
- ✓ [MSRB Form A-12 Annual Affirmation](#). MSRB Rule A-12(k) requires each broker that is a member of the MSRB to review, update as necessary, and affirm the information in Form A-12 during the Annual Affirmation Period that begins on January 1 of each calendar year and ends 17 business days after that. **Due January 25, 2021.**
- ✓ [Quarterly FOCUS Part II/IIA Filings](#): For Quarter ending December 31, 2020. SEC requires that member firms file a FOCUS (Financial and Operational Combined Uniform Single) Report Part II or IIA every quarter. Clearing firms and firms that carry customer accounts file Part II and introducing firms file Part IIA. **Due January 27, 2021.**
- ✓ [Annual FOCUS Schedule I Filing for Period, 2020](#): SEC requires all broker-dealers to submit operational information as of December 31<sup>st</sup> via the Annual FOCUS Schedule 1 Filing. **Due January 27, 2021.**

- ✓ [Quarterly Form Custody](#): SEC requires that member firms file Form Custody under Securities Exchange Act Rule 17a-5(a)(5) for the quarter ending December 31, 2020. **Due January 27, 2021.**
- ✓ [Annual Reports for Fiscal Year-End November 30, 2020](#): SEC requires that member firms submit their annual reports in electronic form. 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. Firms registered in Arizona, Hawaii, Louisiana, or New Hampshire may have additional filing requirements. **Due January 29, 2021.**
- ✓ [SIPC-7 Assessment](#): For firms with a Fiscal Year-End of November 30th. SIPC members are required to file the SIPC-7 General Assessment Reconciliation Form, together with the assessment owed (less any assessment paid with the SIPC-6) within 60 days after the Fiscal Year-End. **Due January 29, 2021.**
- ✓ [SIPC-3 Certification of Exclusion from Membership](#): For firms with a Fiscal Year-End of December 31<sup>st</sup> **AND** claiming an exclusion from SIPC Membership under Section 78ccc(a)(2)(A) of the Securities Investor Protection Act of 1970. This annual filing is due within 30 days of the beginning of each fiscal year. **Due January 30, 2021.**
- ✓ [SIPC-6 Assessment](#): For firms with a Fiscal Year-End of June 30<sup>th</sup>. SIPC members are required to file for the first half of the fiscal year a SIPC-6 General Assessment Payment Form together with the assessment owed within 30 days after the period covered. **Due January 30, 2021.**

## February

- ✓ [Supplemental Inventory Schedule \("SIS"\)](#): For the month ending December 31, 2020. 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. 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. **Due February 1, 2021.**
- ✓ [Supplemental Statement of Income \("SSOI"\)](#): For the quarter ending December 31, 2020. FINRA requires firms to submit additional, detailed information regarding the categories of revenues and expenses reported on the Statement of Income (Loss) page of the FOCUS Report Part II/IIA. **Due February 1, 2021.**
- ✓ [Form OBS](#): For the Quarter ending December 31, 2020. Unless subject to the de minimis exception, all clearing, self-clearing, and carrying firms and those firms that have a minimum dollar net capital requirement equal to or greater than \$100,000 and at least \$10 million in reportable derivatives and other off-balance sheet items must submit Form OBS as of the last day of a reporting period within 22 business days of the end of each calendar quarter via eFOCUS. Firms that claim the de minimis exemption must affirmatively indicate through the eFOCUS system that no filing is required for the reporting period. **Due February 3, 2021.**
- ✓ [Rule 17a-5 Monthly and Fifth FOCUS Part II/IIA Filings](#): For the period ending January 31, 2021. For firms required to submit monthly FOCUS filings and those firms whose fiscal year-end is a date other than a calendar quarter. **Due February 24, 2021.**

## March

- ✓ [Annual Reports for the Fiscal Year-End December 31, 2020](#): FINRA requires that member firms submit their annual reports in electronic form. 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. Firms registered in Arizona, Hawaii, Louisiana, or New Hampshire may have additional filing requirements. **Due March 1, 2021.**
- ✓ [Supplemental Inventory Schedule \("SIS"\)](#): For the month ending January 31, 2021. 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. 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. **Due March 1, 2021.**
- ✓ [SIPC-6 Assessment](#): For firms with a Fiscal Year-End of July 31. SIPC members are required to file for the first half of the fiscal year a SIPC-6 General Assessment Payment Form together with the assessment owed within 30 days after the period covered. **Due March 1, 2021.**
- ✓ [SIPC-7 Assessment](#): For firms with a Fiscal Year-End of December 31st. SIPC members are required to file the SIPC-7 General Assessment Reconciliation Form, together with the assessment owed (less any assessment paid with the SIPC-6) within 60 days after the Fiscal Year-End. **Due March 1, 2021**
- ✓ [SIPC-3 Certification of Exclusion from Membership](#): For firms with a Fiscal Year-End of January 31 **AND** claiming an exclusion from SIPC Membership under Section 78ccc(a)(2)(A) of the Securities Investor Protection Act of 1970. This annual filing is due within 30 days of the beginning of each fiscal year. **Due March 1, 2021.**
- ✓ [Rule 17a-5 Monthly and Fifth FOCUS Part II/IIA Filings](#): For the period ending February 28, 2021. For firms required to submit monthly FOCUS filings and those firms whose fiscal year-end is a date other than a calendar quarter. **Due March 23, 2021.**
- ✓ [Supplemental Inventory Schedule \("SIS"\)](#): For the month ending February 28, 2021. 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. 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. **Due March 26, 2021.**
- ✓ [SIPC-6 Assessment](#): For firms with a Fiscal Year-End of August 31. SIPC members are required to file for the first half of the fiscal year a SIPC-6 General Assessment Payment Form together with the assessment owed within 30 days after the period covered. **Due March 30, 2021.**
- ✓ [SIPC-3 Certification of Exclusion from Membership](#): For firms with a Fiscal Year-End of February 28 **AND** claiming an exclusion from SIPC Membership under Section 78ccc(a)(2)(A) of the Securities Investor Protection Act of 1970. This annual filing is due within 30 days of the beginning of each fiscal year. **Due March 31, 2021.**
- ✓ [SIPC-7 Assessment](#): For firms with a Fiscal Year-End of January 31. SIPC members are required to file

the SIPC-7 General Assessment Reconciliation Form, together with the assessment owed (less any assessment paid with the SIPC-6) within 60 days after the Fiscal Year-End. **Due March 31, 2021.**

## April

- ✓ [Annual Reports for the Fiscal Year-End January 31, 2021](#): FINRA requires that member firms submit their annual reports in electronic form. 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. Firms registered in Arizona, Hawaii, Louisiana, or New Hampshire may have additional filing requirements. **Due Date April 1, 2021.**
- ✓ [Annual Entitlement User Account Certification](#): FINRA requires firms to conduct an annual review of the FINRA application user accounts established for firm personnel and ensure that access and entitlements are appropriate for the personnel's role and responsibilities. The certification period typically begins in early January and ends approximately 30 days later. The Super Account Administrator ("SAA") is responsible for conducting the review, amending and deleting user accounts/entitlements as necessary, and submitting the certification through WebCRD. Only the SAA has access to this certification. Failure to complete the certification by the established deadline will result in all user accounts associated with the firm to be suspended until the certification is complete. **Due date to be determined.**
- ✓ [FINRA Accounting Support Fee](#): Quarterly invoice to support the GASB budget. Based on the municipal securities the firm reported to the MSRB. De Minimis firms (that owe less than \$25) will not receive an invoice. Invoices are sent to the firm via WebCRD's E-Bill. **Due date TBD.**
- ✓ [Customer Complaint Quarterly Statistical Summary](#): For complaints received during the first quarter. FINRA Rule 4530 requires Firms to submit statistical and summary information regarding complaints received during the quarter by the 15<sup>th</sup> day of the month following the calendar quarter. **Due April 15, 2021.**
- ✓ [Quarterly FOCUS Part II/IIA Filings](#): For Quarter ending March 31 2021. FINRA requires that member firms file a FOCUS (Financial and Operational Combined Uniform Single) Report Part II or IIA quarterly. Clearing firms and firms that carry customer accounts file Part II and introducing firms file Part IIA. **Due April 23, 2021.**
- ✓ [Quarterly Form Custody](#): SEC requires that member firms file Form Custody under Securities Exchange Act Rule 17a-5(a)(5) for the quarter ending March 31, 2021. **Due April 23, 2021.**
- ✓ [Supplemental Statement of Income \("SSOI"\)](#): For the quarter ending March 31, 2021. FINRA requires firms to submit additional, detailed information regarding the categories of revenues and expenses reported on the Statement of Income (Loss) page of the FOCUS Report Part II/IIA. **Due April 28, 2021.**
- ✓ [Supplemental Inventory Schedule \("SIS"\)](#): For the month ending March 31, 2021. 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. 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. **Due April 28, 2021.**

- ✓ [Annual Reports for Fiscal Year-End February 28, 2021](#). FINRA requires that member firms submit their annual reports in electronic form. 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. Firms registered in Arizona, Hawaii, Louisiana, or New Hampshire may have additional filing requirements. **Due April 29, 2021.**
- ✓ [SIPC-3 Certification of Exclusion from Membership](#): For firms with a Fiscal Year-End of March 31 **AND** claiming an exclusion from SIPC Membership under Section 78ccc(a)(2)(A) of the Securities Investor Protection Act of 1970. This annual filing is due within 30 days of the beginning of each fiscal year. **Due April 30, 2021.**
- ✓ [SIPC-6 Assessment](#): For firms with a Fiscal Year-End of September 30, 2018. SIPC members are required to file for the first half of the fiscal year a SIPC-6 General Assessment Payment Form together with the assessment owed within 30 days after the period covered. **Due April 30, 2021.**
- ✓ [SIPC-7 Assessment](#): For firms with a Fiscal Year-End of February 28th. SIPC members are required to file the SIPC-7 General Assessment Reconciliation Form, together with the assessment owed (less any assessment paid with the SIPC-6) within 60 days after the Fiscal Year-End. **Due April 30, 2021.**
- ✓ [Form OBS](#): For the Quarter ending March 31, 2021. Unless subject to the de minimis exception, all clearing, self-clearing, and carrying firms and those firms that have a minimum dollar net capital requirement equal to or greater than \$100,000 and at least \$10 million in reportable derivatives and other off-balance sheet items must submit Form OBS as of the last day of a reporting period within 22 business days of the end of each calendar quarter via eFOCUS. Firms that claim the de minimis exemption must affirmatively indicate through the eFOCUS system that no filing is required for the reporting period. **Due April 30, 2021.**

## May

- ✓ [Rule 17a-5 Monthly and Fifth FOCUS Part II/IIA Filings](#): For the period ending April 30, 2021. For firms required to submit monthly FOCUS filings and those firms whose fiscal year-end is a date other than a calendar quarter. **Due May 25, 2021.**
- ✓ [Supplemental Inventory Schedule \("SIS"\)](#): For the month ending April 30, 2021. 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. 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. **Due May 28, 2021.**
- ✓ [SIPC-6 Assessment](#): For firms with a Fiscal Year-End of October 31. SIPC members are required to file for the first half of the fiscal year a SIPC-6 General Assessment Payment Form together with the assessment owed within 30 days after the period covered. **Due May 30, 2021.**
- ✓ [SIPC-7 Assessment](#): For firms with a Fiscal Year-End of March 31st. SIPC members are required to file the SIPC-7 General Assessment Reconciliation Form, together with the assessment owed (less any assessment paid with the SIPC-6) within 60 days after the Fiscal Year-End. **Due May 30, 2021.**
- ✓ [SIPC-3 Certification of Exclusion from Membership](#): For firms with a Fiscal Year-End of April 30th,

**AND** claiming an exclusion from SIPC Membership under Section 78ccc(a)(2)(A) of the Securities Investor Protection Act of 1970. This annual filing is due within 30 days of the beginning of each fiscal year. **Due May 31, 2021.**

## June

- ✓ [Annual Reports for Fiscal Year-End March 31, 2021](#): FINRA requires that member firms submit their annual audit reports in electronic form. 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. Firms registered in Arizona, Hawaii, Louisiana, or New Hampshire may have additional filing requirements. **Due June 1, 2021.**
- ✓ [Rule 17a-5 Monthly and Fifth FOCUS Part II/IIA Filings](#): For the period ending May 31, 2021. For firms required to submit monthly FOCUS filings and those firms whose fiscal year-end is a date other than a calendar quarter. **Due June 23, 2021.**
- ✓ [Supplemental Inventory Schedule \("SIS"\)](#): For the month ending May 31, 2021. 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 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. 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. **Due June 28, 2021.**
- ✓ [SIPC-7 Assessment](#): For firms with a Fiscal Year-End of April 30th. SIPC members are required to file the SIPC-7 General Assessment Reconciliation Form, together with the assessment owed (less any assessment paid with the SIPC-6) within 60 days after the Fiscal Year-End. **Due June 29, 2021.**
- ✓ [Annual Reports for Fiscal Year-End April 30, 2021](#): FINRA requires that member firms submit their annual reports in electronic form. 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. Firms registered in Arizona, Hawaii, Louisiana, or New Hampshire may have additional filing requirements. **Due June 29, 2021.**
- ✓ [SIPC-3 Certification of Exclusion from Membership](#): For firms with a Fiscal Year-End of May 31 **AND** claiming an exclusion from SIPC Membership under Section 78ccc(a)(2)(A) of the Securities Investor Protection Act of 1970. This annual filing is due within 30 days of the beginning of each fiscal year. **Due June 30, 2021.**
- ✓ [SIPC-6 Assessment](#): For firms with a Fiscal Year-End of November 30th. SIPC members are required to file for the first half of the fiscal year a SIPC-6 General Assessment Payment Form together with the assessment owed within 30 days after the period covered. **Due June 30, 2021.**

## July

- ✓ [FINRA Accounting Support Fee](#): Quarterly invoice to support the GASB budget. Based on the municipal securities the firm reported to the MSRB. De Minimis firms (that owe less than \$25) will not receive an invoice. Invoices are sent to the firm via WebCRD's E-Bill. **Due date TBD.**

- ✓ [Customer Complaint Quarterly Statistical Summary](#): For complaints received during the second quarter. FINRA Rule 4530 requires Firms to submit statistical and summary information regarding complaints received during the quarter by the 15<sup>th</sup> day of the month following the calendar quarter. **Due July 15, 2021.**
- ✓ [Quarterly FOCUS Part II/IIA Filings](#): For Quarter ending June 30, 2021. FINRA requires that member firms file a FOCUS (Financial and Operational Combined Uniform Single) Report Part II or IIA quarterly. Clearing firms and firms that carry customer accounts file Part II and introducing firms file Part IIA. **Due July 26, 2021.**
- ✓ [Quarterly Form Custody](#): SEC requires that member firms file Form Custody under Securities Exchange Act Rule 17a-5(a)(5) for the quarter ending June 30, 2021. **Due July 26, 2021.**
- ✓ [Supplemental Statement of Income \(“SSOI”\)](#): For the quarter ending June 30, 2021. FINRA requires firms to submit additional, detailed information regarding the categories of revenues and expenses reported on the Statement of Income (Loss) page of the FOCUS Report Part II/IIA. **Due July 29, 2021.**
- ✓ [Supplemental Inventory Schedule \(“SIS”\)](#): For the month ending June 30, 2021. 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. 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. **Due July 29, 2021.**
- ✓ [Annual Reports for Fiscal Year-End May 31, 2021](#): FINRA requires that member firms submit their annual reports in electronic form. 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. Firms registered in Arizona, Hawaii, Louisiana, or New Hampshire may have additional filing requirements. **Due July 30, 2021.**
- ✓ [SIPC-3 Certification of Exclusion from Membership](#): For firms with a Fiscal Year-End of June 30 **AND** claiming an exclusion from SIPC Membership under Section 78ccc(a)(2)(A) of the Securities Investor Protection Act of 1970. This annual filing is due within 30 days of the beginning of each fiscal year. **Due July 30, 2021.**
- ✓ [SIPC-6 Assessment](#): For firms with a Fiscal Year-End of December 31. SIPC members are required to file for the first half of the fiscal year a SIPC-6 General Assessment Payment Form together with the assessment owed within 30 days after the period covered. **Due July 30, 2021.**
- ✓ [SIPC-7 Assessment](#): For firms with a Fiscal Year-End of May 31. SIPC members are required to file the SIPC-7 General Assessment Reconciliation Form, together with the assessment owed (less any assessment paid with the SIPC-6) within 60 days after the Fiscal Year-End. **Due July 30, 2021.**

## August

- ✓ [Form OBS](#): For the Quarter ending June 30, 2021. Unless subject to the de minimis exception, all clearing, self-clearing, and carrying firms and those firms that have a minimum dollar net capital requirement equal to or greater than \$100,000 and at least \$10 million in reportable derivatives and other off-balance sheet items must submit Form OBS as of the last day of a reporting period within

22 business days of the end of each calendar quarter via eFOCUS. Firms that claim the de minimis exemption must affirmatively indicate through the eFOCUS system that no filing is required for the reporting period. **Due August 2, 2021.**

- ✓ [Rule 17a-5 Monthly and Fifth FOCUS Part II/IIA Filings](#): For the period ending July 31, 2021. For firms required to submit monthly FOCUS filings and those firms whose fiscal year-end is a date other than a calendar quarter. **Due August 24, 2021.**
- ✓ [Supplemental Inventory Schedule \(“SIS”\)](#): For the month ending July 31, 2021. 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. 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. **Due August 27, 2021.**
- ✓ [Annual Reports for Fiscal Year-End June 30, 2021](#): FINRA requires that member firms submit their annual reports in electronic form. 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. Firms registered in Arizona, Hawaii, Louisiana, or New Hampshire may have additional filing requirements. **Due August 30, 2021.**
- ✓ [SIPC-7 Assessment](#): For firms with a Fiscal Year-End of June 30. SIPC members are required to file the SIPC-7 General Assessment Reconciliation Form together with the assessment owed (less any assessment paid with the SIPC-6) within 60 days after the Fiscal Year-End. **Due August 29, 2021.**
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- ✓ [Rule 17a-5 Monthly and Fifth FOCUS Part II/IIA Filings](#): For the period ending August 31, 2021. For firms required to submit monthly FOCUS filings and those firms whose fiscal year-end is a date other than a calendar quarter. **Due September 24, 2021.**
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- ✓ [Annual Reports for the Fiscal Year-End July 31, 2021](#): FINRA requires that member firms submit their annual audit reports in electronic form. 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. Firms registered in Arizona, Hawaii, Louisiana, or New Hampshire may have additional filing requirements. **Due September 29, 2021.**



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- ✓ [SIPC-6 Assessment](#): For firms with a Fiscal Year-End of February 29. SIPC members are required to file for the first half of the fiscal year a SIPC-6 General Assessment Payment Form together with the assessment owed within 30 days after the period covered. **Due Date September 30, 2021.**
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## October

- ✓ [FINRA Accounting Support Fee](#): Quarterly invoice to support the GASB budget. Based on the municipal securities the firm reported to the MSRB. De Minimis firms (that owe less than \$25) will not receive an invoice. Invoices are sent to the firm via WebCRD’s E-Bill. **Due date to be determined.**
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## November

- ✓ [Annual Reports for the Fiscal Year-End August 31, 2021](#). FINRA requires that member firms submit their annual audit reports in electronic form. 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. Firms registered in Arizona, Hawaii, Louisiana, or New Hampshire may have additional filing requirements. **Due November 1, 2021.**
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- ✓ [Form OBS](#): For the Quarter ending September 30th. Unless subject to the de minimis exception, all clearing, self-clearing, and carrying firms and those firms that have a minimum dollar net capital requirement equal to or greater than \$100,000 and at least \$10 million in reportable derivatives and other off-balance sheet items must submit Form OBS as of the last day of a reporting period within 22 business days of the end of each calendar quarter via eFOCUS. Firms that claim the de minimis exemption must affirmatively indicate through the eFOCUS system that no filing is required for the reporting period. **Due November 2, 2021.**
- ✓ [Rule 17a-5 Monthly and Fifth FOCUS Part II/IIA Filings](#): For the period ending October 31, 2021. For firms required to submit monthly FOCUS filings and those firms whose fiscal year-end is a date other than a calendar quarter. **Due November 24, 2021.**
- ✓ [SIPC-7 Assessment](#): For firms with a Fiscal Year-End of September 30. SIPC members are required to file the SIPC-7 General Assessment Reconciliation Form together with the assessment owed (less any assessment paid with the SIPC-6) within 60 days after the Fiscal Year-End. **Due November 29, 2021.**
- ✓ [Annual Reports for Fiscal Year-End September 30, 2021](#): FINRA requires that member firms submit their annual reports in electronic form. 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. Firms registered in Arizona, Hawaii, Louisiana, or New Hampshire may have additional filing requirements. **Due November 29, 2021.**
- ✓ [SIPC-3 Certification of Exclusion from Membership](#): For firms with a Fiscal Year-End of October 31 **AND** claiming an exclusion from SIPC Membership under Section 78ccc(a)(2)(A) of the Securities

Investor Protection Act of 1970. This annual filing is due within 30 days of the beginning of each fiscal year. **Due November 30, 2021.**

- ✓ [SIPC-6 Assessment](#): For firms with a Fiscal Year-End of April 30, 2019. SIPC members are required to file for the first half of the fiscal year a SIPC-6 General Assessment Payment Form together with the assessment owed within 30 days after the period covered. **Due November 30, 2021.**
- ✓ [Supplemental Inventory Schedule \(“SIS”\)](#): For the month ending October 31, 2021. 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. 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. **Due November 30, 2021.**

## December

- ✓ [2021 Preliminary Renewal Statement is due in full](#). Consult the FINRA website for specific dates. **Due date to be determined.**
- ✓ [Statement Regarding Independent Public Accountant](#): Due no later than December 10<sup>th</sup> of each year, unless your engagement is continuing, providing for successive engagements. **Due December 10, 2021.**
- ✓ [Rule 17a-5 Monthly and Fifth FOCUS Part II/IIA Filings](#): For the period ending November 30, 2021. For firms required to submit monthly FOCUS filings and those firms whose fiscal year-end is a date other than a calendar quarter. **Due December 23, 2021.**
- ✓ [Supplemental Inventory Schedule \(“SIS”\)](#): For the month ending November 30. 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. 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. **Due December 29, 2021.**
- ✓ [Annual Reports for Fiscal Year-End October 31, 2021](#): FINRA requires that member firms submit their annual reports in electronic form. 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. Firms registered in Arizona, Hawaii, Louisiana, or New Hampshire may have additional filing requirements. **Due December 30, 2021.**
- ✓ [SIPC-3 Certification of Exclusion from Membership](#): For firms with a Fiscal Year-End of November 30 **AND** claiming an exclusion from SIPC Membership under Section 78ccc(a)(2)(A) of the Securities Investor Protection Act of 1970. This annual filing is due within 30 days of the beginning of each fiscal year. **Due December 30, 2021.**
- ✓ [SIPC-6 Assessment](#): For firms with a Fiscal Year-End of May 31. SIPC members are required to file for the first half of the fiscal year a SIPC-6 General Assessment Payment Form together with the assessment owed within 30 days after the period covered. **Due December 30, 2021.**

- ✓ [SIPC-7 Assessment](#): For firms with a Fiscal Year-End of October 31. SIPC members are required to file the SIPC-7 General Assessment Reconciliation Form together with the assessment owed (less any assessment paid with the SIPC-6) within 60 days after FYE. **Due December 30, 2021.**

## General and On-going Obligations

Form BD Amendments: Firms are required to keep current the information filed on Form BD. Amendments must be filed promptly whenever the information on file becomes inaccurate or incomplete for any reason.

[Form CRS Relationship Summary](#): Form CRS and its related rules require SEC-registered investment advisers and SEC-registered broker-dealers to deliver to retail investors a brief customer or client relationship summary that provides information about the firm. Form CRS must be amended within 30 days of any information becoming materially inaccurate.

[Form U4 Amendments](#): Registered individuals and firms are required to keep current the information filed on Form U4. Registered individuals must promptly notify the firm if any information changes or becomes inaccurate. Firms must file amendments promptly upon becoming aware of changes to the information on file.

[Form U5](#): Firms are required to submit a full termination for registered individuals within 30 days of the termination date.

[Form 4530 Event Filing](#): FINRA Rule 4530 requires firms to report specified events to FINRA electronically through the Firm Gateway. These reporting requirements are in addition to what the firm may need to report on Form BD. Filings should be submitted promptly but in any event not later than 30 calendar days after the firm knows or should have known of the reportable event.

[Form BR Amendments and Withdrawal](#): Firms are required to keep current the information filed on The Uniform Branch Office Registration Form ("Form BR") for each registered office location.

[MSRB Form A-12 Amendments and Withdrawal](#): Firms are required to keep current the information filed on MSRB Form A-12. Amendments should be submitted within 30 days if any information becomes inaccurate or if the firm ceases to be engaged in municipal securities or municipal advisory activities.

[FinCEN Reviews](#): Firms are required by FinCEN to review requests and compare against their list of customers and vendors and report hits to FinCEN within a specified period following the receipt of such request.

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### Partner with Hardin Compliance

Keeping current with regulatory changes while also doing your day job is difficult; partnering with Hardin Compliance can bring you peace of mind with our comprehensive compliance services. Call us today at 833.942-2218, or visit our website at [www.hardincompliance.com](http://www.hardincompliance.com) for more information.

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