

Registration Filing in FINRA Gateway - Enhanced Form U4 Filing Experience Summary of Changes

Important Information

- The purpose of this document is to provide a useful reference for how the enhanced Form U4 filing experience in FINRA Gateway differs from the Form U4 filing experience in Classic CRD.
- This reference document is not a substitute for the <u>official Form U4</u> or any other FINRA guidance.
- This document does not represent all completeness checks, validations or logic that are utilized when completing the Form U4 online.
- This document does not represent all specific changes to the enhanced Form U4 data entry experience that have been introduced or that will be introduced.

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Introduction

As part of FINRA's registration transformation and overall digital transformation, FINRA is <u>adding</u> <u>registration filings to FINRA Gateway</u>. The first filing made available in this new process is Form U4. As of April 5, 2021, the Classic CRD U4 filing process has been retired and all U4 filings must be submitted through FINRA Gateway.

Changes made to the online filing process were driven by goals that included more logical grouping of information, refining completeness checks and data validations, and making support materials more accessible. These improvements should reduce any necessary training for new compliance and registration staff, improve the quality of data provided and decrease the volume of filings requiring corrections.

This document is intended to provide a high-level overview of the changes to the enhanced Form U4 data entry experience. It describes both the changes to the way filers interact with the system and the enhancements to the data entry experience.

For questions or feedback regarding this documentation, please email <u>feedbackfinragateway@finra.org</u> or open an online self-service ticket through FINRA Gateway.

Access

ltem	Classic CRD Experience (Retired)	FINRA Gateway Experience
Accessing Form U4	Firms accessed CRD directly or through Firm Gateway to create or resume a Form U4 filing.	Firms create and resume Form U4 within FINRA Gateway.
Entitlement	CRD → Form U4	The same classic entitlement controls access to the filing experience in FINRA Gateway. No new entitlements are required for the enhanced Form U4 filing process.

System Functionality

1 1		
Task	Classic CRD Experience (Retired)	FINRA Gateway Experience
How to Create and		
Resulle a 04		
Pre-registration	Pre-registration searches occurred	Pre-registration searches are part of
Search	outside the Form U4 filing creation	the Form U4 filing creation process.
	process.	
Selecting Filing Type	User began the filing process by first selecting the appropriate Form U4 filing type — for example, Initial, Amendment or Dual — and then searches for the desired individual.	User begins the filing process by first searching for the desired individual. When viewing the individual's profile, an option to create the appropriate Form U4 filing type will display based on the individual's current status with the firm. (As of 11/21/2020, all Form U4 filing types are available through FINRA Gateway.)

Creating a U4 Initial,	User selected the specific filing type	User follows these steps:
Relicense or Dual	needed and then searched for an	Choose "Pre-Registration"
	individual or created a new CRD	from the Profile Search drop-
	record.	down menu.
		 Type in SSN and DOB (or Name
		& DOB if the rep has no SSN)
		and conduct the search.
		 Select the appropriate
		individual's record from the
		search results to view the
		profile OR if no record exists
		the option to create a new
		individual record will appear.
		 From the individual's profile
		Actions card
		The system will infer the
		 The system will filler the correct filing type based on the
		individual's current status and
		the firm's responses to
		questions within the filing.
Creating a U4	User chose the Amendment filing	To file an Amendment for an individual
Amendment	type and then searched for an	already associated with your firm,
	individual.	conduct the standard individual search
		to view the profile and then select
		"Update (U4 Amendment)" in the
		Actions card.
Creating Other U4	User chose the appropriate Form U4	When appropriate, these filing types
Filing Types	filing type and then searched for an	will display in the Actions card after
	individual:	conducting the relevant search as
	• Page 2	described in the steps above.
	Concurrence	
Posuming a Draft 114	Draft filings were stored in the	Draft filings can be accessed from two
nesuming a Drait 04	Pending 114 Filings queue in Classic	places in FINRA Gateway.
	CRD.	Requests & Filings (filter by 114
		or filing type)
		 Drafts card on the individual's
		profile
Completing the U4		
Completeness Check	Completeness Check errors were	Completeness Checks are available in
	displayed on a separate page.	any section while completing the form.

Help/Guidance	This was not available within the Classic U4 filing. Users either linked to an external definitions document or searched for additional guidance on FINRA.org.	 Defined terms & Disclosure related interpretive guidance can be accessed within the form: Defined terms – available as a pop up Disclosure questions interpretive guidance – click on the "?" Icon next to Disclosure questions
Printing	Users printed individual sections or entire official Form U4 using Print Preview link.	Able to print individual sections or entire official Form U4 using Form View link.
Viewing Changes	Changes were viewed in redline mode via Print Preview.	Changes can be highlighted using the "Compare With Previous Filing" option in Form View.
Submitting the U4		
Submit Filing	Submission occurred after passing the Completeness Check.	In addition to passing the Completeness Check, firms are required to view the official version of the form prior to submission in the Summary section.
Filing History	Submitted filings were available in the Filing History section of View Individual in Classic CRD	Filing History is not currently available in FINRA Gateway. Filers should continue to view submitted filings in the Filing history section of View Individual in Classic CRD.

Allow Rep Edits (Optional)

Classic CRD Experience (Retired)	FINRA Gateway Experience
Classic CRD Experience (Retired) Firms optionally elected to collaborate with the individual when completing Form U4. Firms provided the individual with access to all sections of the U4 or excluded a defined list of sections (SRO Registrations, Jurisdiction Registration, Registration Request with affiliated Firms, Examination Requests and Professional	FINRA Gateway Experience Firms can optionally elect to collaborate with the individual when completing Form U4. Firms can provide access on a section- by-section basis or choose to provide access to all sections. (Note: The rep edits process is separate from FINRA's new <u>electronic signature</u> <u>solution</u> .)
Designations).	
	Classic CRD Experience (Retired) Firms optionally elected to collaborate with the individual when completing Form U4. Firms provided the individual with access to all sections of the U4 or excluded a defined list of sections (SRO Registrations, Jurisdiction Registration, Registration Request with affiliated Firms, Examination Requests and Professional Designations).

Rep Access	The individual accessed a shared Form U4 by providing a unique reference number on <u>https://filing.crd.finra.org/crdmain</u> Or via the Financial Professional Gateway (FinPro).	Individuals must use FinPro to access a draft Form U4 shared by the firm. (See <u>this page</u> for additional details.) Reference numbers are no longer provided.
Firm Access During Rep Access	The firm was unable to access the filing in CRD while rep edits was enabled.	 The firm can always access the filing and track the individual's progress by viewing the "Rep Completion Status" field in Requests. The following statuses will display: Not Available – Rep access has not been enabled for this filing Available – Rep access has been enabled but individual has not indicated completion Completed – Individual has finished edits and selected "Return to Firm" in FinPro (see below)
Rep Completion of Edits	When finished, the individual returned the filing to the firm using the "Submit to Firm" link within the form. This automatically removed access for the individual.	The individual indicates they are finished by navigating to the Summary section and selecting "Return to Firm". Completion status is visible to the firm when viewing the draft Form U4 in FINRA Gateway Requests and within the Allow Rep Edits section of the filing. This <u>does not</u> automatically remove access for the individual. If the firm wishes to remove the individual's access, the firm needs to explicitly change the access level to "No Access" within the draft filing.
Form Submission	Only the firm could submit the filing to FINRA. The individual could not submit anything directly to FINRA.	Only the firm can submit the filing to FINRA. The individual cannot submit anything directly to FINRA.

Visual Data Layout

Data Element	Classic CRD Experience (Retired)	FINRA Gateway Experience
Personal	Contained in multiple sections:	One "Personal Information" section
Information	 (1) General Information 	containing General Information,
	• (9) Identifying	Identifying Information, Other Names
	Information/Name Change	and Residential History information.
	• (10) Name Change	
	 (11) Residential History 	
Franlaymant	Contained in multiple costions:	Combined "Employment History/Other
Information	(12) Employment Listers	Rusiness" section
Information	• (12) Employment History	Busilless section.
	• (13) Other Business	
Registration	Contained in multiple sections:	One "Registration Requests with Firms"
Information	• (1) General Information	section to capture all firm associations
	 (2) Fingerprint Information 	requested in the filing (including
	 (4) SRO Registrations 	affiliated firms).
	 (5) Jurisdiction Registration 	
	 (6) Registration Requests with 	Separate entry for each firm containing
	Affiliated Firms	Firm Profile, Office of Employment
		Address, Registrations, Jurisdictions
		and Fingerprints information.
Dual Registration	Contained in one section:	One "Registration with Unaffiliated
	• (3) Registration with Unaffiliated	Firms" section.
	Firms	
Evam Requests	Contained in one section:	One "Exam Requests" section
Exam nequests	(7) Examination Requests	one Examinequests section.
Professional	Contained in one section:	One "Professional Designations"
Designations	 (8) Professional Designations 	section.
Disclosure	Contained in multiple sections:	One "Disclosures" section containing
Information	• (14) Disclosure Questions	senarate pages for each disclosure type
	• DBPs	that combines the Disclosure Questions
		and the Disclosure Reporting Pages
	Disclosure questions and DRPs	(DRP).
	matched paper form layout	
		Some questions/fields have been
		reordered or separated for clarity
		during data entry (official Form U4 view
		is unchanged).
Signatures	Contained in one section:	One "Signatures" section.
	 (15) Signatures 	
		As of September 25, 2021, FINRA's
		electronic signature solution is
		available for use on Form U4 filings.