

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

Item	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

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Task	Classic CRD Experience (Retired)	FINRA Gateway Experience
How to Create and Resume a U4		
Pre-registration Search	Pre-registration searches occurred outside the Form U4 filing creation process.	Pre-registration searches are part of the Form U4 filing creation 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, Relicense or Dual	User selected the specific filing type needed and then searched for an individual or created a new CRD record.	 User follows these steps: Choose "Pre-Registration" from the Profile Search drop- 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 select "Add as a Rep" in the Actions card. The system will infer the correct filing type based on the individual's current status and the firm's responses to questions within the filing.
Creating a U4 Amendment	User chose the Amendment filing type and then searched for an individual.	To file an Amendment for an individual already associated with your firm, conduct the standard individual search to view the profile and then select "Update (U4 Amendment)" in the Actions card.
Creating Other U4 Filing Types	User chose the appropriate Form U4 filing type and then searched for an individual: Page 2 Concurrence	When appropriate, these filing types will display in the Actions card after conducting the relevant search as described in the steps above.
Resuming a Draft U4	Draft filings were stored in the Pending U4 Filings queue in Classic CRD.	 Draft filings can be accessed from two places in FINRA Gateway: Requests & Filings (filter by U4 or filing type) Drafts card on the individual's profile
Completing the U4 Completeness Check	Completeness Check errors were displayed on a separate page.	Completeness Checks are available in 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)

Feature	Classic CRD Experience (Retired)	FINRA Gateway Experience
Firm Grants Access	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).	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> .)

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