



Top 10 Year-End Compliance To-Dos

- 1. Budget.** Consider your budget for the coming year. Don't forget about conferences, webinars, and subscriptions to publications. Do you plan to engage outside consultants or service providers? Any changes to operations or technology?
- 2. Compliance Calendar.** Review your compliance calendar now and address any open items for this year and update the calendar for any new items you'll need to address next year. Don't forget to add new matters, such as testing around political contributions by covered associates.
- 3. Annual Review.** Year-end is a good time to take stock of your obligation to review your firm's compliance program. Are you confident that you adequately reviewed your program and documented your findings? Were there any material changes to your policies and procedures as a result?
- 4. Risk Assessment.** Review your Risk Assessment to determine if there are high-risk areas you should test before the year winds up. As you prepare for the coming year, update the document so you remain prepared for your testing program.
- 5. Conflicts of Interest Inventory.** Review and update your firm's conflicts inventory. Solicit input now from your business lines. Consider both business and employees' personal conflicts.
- 6. Client Disclosures.** Ensure your firm provided the necessary disclosures to clients and prospects during the year, including your Privacy Notice and ADV Parts 2A and 2B.
- 7. Access Persons Code Reporting.** Have your access persons delivered all required reports (Quarterly Transactions, Annual Holdings, and Code Acknowledgements)?
- 8. Insurance Levels.** Review your firm's insurance and ensure all necessary policies are at the appropriate levels. Did your firm obtain new ERISA clients during the year? If so, confirm your bonding requirements are met.
- 9. Regulatory Filings.** You must update and file your annual update of ADV (Parts 1 and 2A) by March 30th. Be ready for expanded disclosures of Part 1 as a result of the recent amendments to Form ADV. Ensure Part 1 Item 11 disclosures are accurate, as this section must be updated when the information becomes inaccurate in any way. You will also want to ensure you have everything in place for your state notice filings; check www.iard.com/renewals.asp for further information, and to ensure you have sufficient funds in your IARD account to cover all filing fees.
- 10. Custody.** Have you performed due inquiry (as required by the Custody Rule) to ensure custodians are sending statements to clients?