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TO	John Wooten
FROM	Information Operations, Document Services
SUBJECT	New Fingerprint Program Update and Retirement of Legacy Fingerprinting Platform
DATE	9/22/2023

This memo is to notify you that FINRA's new **Fingerprint Program for Transfer Agents/Clearing Agencies (TA/CAs) ("Program")** will launch on **October 2, 2023**, as the SEC declared FINRA's updated Fingerprint Plan effective September 22, 2023. Starting on this date, fingerprints of those organizations that choose to participate will be processed by Sterling Identity (Sterling), FINRA's designated provider.

The new Program objectives are to reduce fingerprint rejections, offer secure electronic transmission of FBI results, quicker turn-around times, and eliminate the current FINRA fingerprint fee. Sterling will channel TA/CA fingerprints to the FBI and assess and collect from participants all fingerprint fees, including the FBI fee. FINRA will send FBI results through secure email to each participating TA/CA.

To prepare for the new Program launch, details on what to expect and what is required to participate in the new Program are provided below.

To participate in the new Program, please complete the following steps.

1. Create an account with Sterling –

All TA/CAs that participate in the new Program will need to create an account with Sterling. Starting **September 25, 2023**, organizations will be able to contact Sterling to create an account. An account is required if a TA/CA submits either electronic or hardcopy fingerprint cards. Please visit <http://offers.sterlingcheck.com/en-us/welcome-to-sterlings-fingerprinting-hub-for-ta-cas> to create a Sterling account.

2. Confirm your organization has a product to decrypt results –

TA/CAs must be able to open an encrypted zip file by using WinZip or a similar product as FBI results will be encrypted when FINRA disseminates them to a TA/CA. FINRA will provide each participating organization with a unique password to use to access results. FINRA will distribute the password once an account is created with Sterling. FINRA will send the credentials and instructions via a letter to the individual designated as the point of contact.

3. Order new Program fingerprint cards –

Sterling offers 650 electronic fingerprint capture locations in the U.S. and its territories where candidates can have their fingerprints collected electronically via live scan devices. However, TA/CAs that elect to use hardcopy cards must purchase new fingerprint cards that have been designed for the new Program. New Program fingerprint cards are available for purchase from Sterling at <http://offers.sterlingcheck.com/en-us/welcome-to-sterlings-fingerprinting-hub-for-ta-cas>.

Transition to New Program

FINRA and Sterling are committed to providing a smooth transition. At the time of Program launch, please note the following:

- FINRA will forward fingerprint cards it receives on current cardstock to Sterling. However, before Sterling can process the fingerprint cards, your organization must create an account with Sterling. Although Sterling will contact organizations that have not yet created a Sterling account and have mailed fingerprint cards on existing cardstock, it is highly recommended that your organization contact Sterling to create an account as soon as possible to avoid processing delays.
- Fingerprints sent on current cardstock that are processed through Sterling will require payment to Sterling. Sterling will invoice monthly for all fingerprint-related fees.
- As Sterling will collect all fingerprint-related fees, FINRA will refund or return money received for processing fees from fingerprint cards that FINRA forwards to Sterling.
- To assist with the transition, current FINRA cardstock may be used for hard card processing until November 30, 2023. On and after December 1, 2023, only new FINRA-specific fingerprint cards created for the new Program will be accepted for processing.

You can review Program details including Frequently Asked Questions at <https://www.finra.org/fingerprint-program-ta-ca>.

For questions, please contact ta_ca.operations@finra.org.



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