**Review Schedule –**

*Setting review priorities on ongoing basis/updating what you need*

|  |  |  |
| --- | --- | --- |
| **Firm Review System**  **(determine dates to check)** | **Policies**  **(items based on manual)** | **Review Center Procedures**  **(agenda + steps for compliance)** |
| Annual  (e.g. renewal statements)  Quarterly  (e.g. code of ethics)  Monthly  (e.g. email notifications)  Ongoing  (e.g. fees, invoicing)  Daily  (e.g. trading guidelines) | Advisory Agreement |  |
| Agency Cross Transactions |  |
| Annual Certification Meeting  (Access Persons) |  |
| Annual Compliance Review |  |
| Best Execution |  |
| Books and Records |  |
| Branch Office Review |  |
| Client Correspondence |  |
| Client File(s) |  |
| Code of Ethics |  |
| Compliance Directory |  |
| Corporate Records |  |
| Custody |  |
| Cybersecurity |  |
| Directed Brokerage |  |
| Disaster Recovery/Business Continuity Plan |  |
| Disclosure Documents |  |
| Email & Electronic Communications |  |
| ERISA/Fiduciary Rule prep |  |
| Insider Trading |  |
| Fees |  |
| Financials |  |
| Performance |  |
| Personal Securities Holdings (Access Persons) |  |
| Political Contributions |  |
| Principal Transactions |  |
| Privacy Policy |  |
| Proxy Voting |  |
| Registration & Licensing | *Firm will pay annual fees by renewal period (due 12/17/18)* |
| Regulatory Requirements |  |
| Robo-Advisory Services |  |
| Safe Senior Act/Elderly Abuse |  |
| Soft Dollars |  |
| Solicitor Arrangements |  |
| Supervision & Internal Controls |  |
| Trading |  |
| Valuation of Securities |  |
| Whistleblower |  |

**Part 2 - Onboarding RIA Review –**

|  |  |
| --- | --- |
| **Action Plan/Functions** | **Purpose** |
| **Calendar** | Reminder for upcoming dates.  Preliminary Renewal Statements (annual Fee statements) – released on 11/12/18  Annual Filing Fees – due by 12/17/18 (pay via IARD/CRD e-bill)  Annual Offer Letter - Send offer letter to clients (brochure or summary of material changes, privacy policy notice\*) - due 4/30/2019- within 120 days of firm's fiscal year-end.  Send privacy policy directly to clients & make available on website.  Next ADV amendment due – 3/31/2019 – within 90 days for firm’s fiscal year end |
| **To-Do List** | Set Reminders for tasks in procedures manual |
| **Forms** | Update Documentation (Agreements) |
| **Cloud Directory** | Copy Books/Records from cloud. |
| **Checklists/Review Center** | Determine what you need to review/update (*setting priorities*) |
| **Client Delivery (Maps)** | Guidelines on what to send to clients annually (ADV/Privacy Policy) |