



# Supervisory duties chart for Financial Professionals

This document has instructions for OneHub that says to go to the app on your sidebar. You may need to add the app, if you do not find it.

Financial Professional's responsibility	What to do	Frequency	Procedure	System(s)	Where to file	How long to retain
Client Application; Account Application; Client Signature Page; Margin and Option Agreement, etc.	Log into the eQuipt(new) Account system and check the queue for any account submittals and needed updates.	Daily	Retain copy of Client Signature page and, if applicable, supporting documentation, including but not limited to trust and estate documents, adoption agreements, margin and option agreements, duty of care new account addendum or worksheet, RightBridge/RTDF, etc., for client file. Copies of supporting documentation and the client signature page are still required and must be forwarded to the home office within 30 days of account opening.	Account Supervision, Document Management, eQuipt (new), RightBridge, Quick Forms, Support Center.	Client file. If using Document Management /Vault client file is created automatically.	Life of Account Plus 6 Years.  N/A if using Document Management/ Vault.
Account Supervision	Log into eQuipt(new) and review any records in the Alerts queue.	Daily	Address items in queue to be addressed within 5 days and reconciled with FLS within 15 days.	eQuipt(new)	Retained electronically	N/A (retained electronically by Firm).
Transaction Review Preparation (TR-Prep)	Log into TR-Prep to determine if all transactions were submitted for review.	Daily	Transactions need to be linked to the appropriate NB account and missing information must be updated daily and cleared within 15 days.	Transaction Review Preparation	N/A	N/A
Transaction Review Supervision (TRS/TR Supv)	Reconcile your transactions on the RR level and submit through to your FLS.	Daily	Pending RR queues should be addressed within 5 days and reconciled with the FLS within 15 days.	Transaction Review Supervision	Retained electronically by TRS once transactions are reconciled.	N/A (retained electronically by Firm).

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Direct Order Entry (blottering)	Some products require blottering on the Direct Order Entry on the Account Blotters App. Please refer to the Account Blottering & Log Review page on OneHub for a comprehensive list of products as well as the Blottering Non-Brokerage Transactions Guide.	Daily	Trades are blottered in the "Account Blotters app" located on the OneHub sidebar. Choose the product type from the drop down menu. Must be blottered at or prior to sending the application to the sponsor company.	Retained electronically on OneHub once entered into Direct Order Blottering system.	N/A	N/A (retained electronically by Firm).
Personal Accounts	Personal Trading Accounts must be disclosed via ECM System on OneHub. This includes Pershing, NFS and outside custodians. Any changes to accounts must be updated as needed.	Within 10 (ten) calendar days of affiliation, and then, as needed. Must be verified/updated at least annually.	Visit the "ECM System app" located on the OneHub sidebar.  Once in ECM, certify your identity and select "Open Tasks" found under the ECM Dashboard and complete all outstanding certifications.	ECM System	Retained electronically by ECM System.	N/A (retained electronically by Firm).
Incoming and Outgoing Written Correspondence / Consolidated Reports	Copies of Written Client Correspondence (including faxes, consolidated reports and 72t disclosures), must be prepared using an approved vendor, need to be maintained in a central correspondence file and provided or sent to your FLS.  Financial Professionals may not "self-create" their own consolidated reports. In other words, Financial Professionals may not create their own template using Microsoft Word or Excel and then manually populate that template with the client's holdings, account values and performance data.	Copies of all outgoing and incoming correspondence and consolidated must be submitted monthly. Submissions are due on the 15th of the month for the previous month. Please note: All branches in Virginia must submit weekly rather than monthly.	Upload all correspondence to the Support Center or to Document Management coded as "Ready for Principal Review".  Financial Professionals must submit copies of all consolidated reports regardless of distribution (i.e. electronic, written, or hand delivered) as correspondence. OneView and Wealth Management Platform (WMP) Reports are excluded from this requirement.  Financial Professionals must include with their correspondence the source documentation for any manual assets added to consolidated reports.	Document Management / Support Center	Retained electronically by Document Management or Support Center	N/A (retained electronically by Firm).

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Email (Incoming and Outgoing Electronic Correspondence)	Financial Professionals and staff must use a firm-approved email address for ALL business-related emails, including client, internal office, vendor, and broker-dealer emails.	Daily	Use a firm-approved email address for ALL business-related emails, including client, internal office, vendor, and broker-dealer emails.	Veritas Advanced Supervision and Smarsh	Retained electronically on Veritas Advanced Supervision.	NA, Maintained by Veritas Advanced Supervision.
Account Periodic	<p>Timely review to include but not limited to: account suitability, portfolio model, risk tolerance, trading activity concerns, problematic trends. IAR needs to address the individual flags and determine if the advisory account remains in the client's best interest.</p> <p>Reconcile your accounts on the RR level and submit through to your FLS.</p>	Weekly	<p>15-month Flag: the IAR must provide evidence of at least one client meeting within the 12 months prior to the triggering of the flag. Furthermore, IAR must ensure that account is trading within the portfolio risk model.</p> <p>21-month Flag: IAR will be alerted of wrap accounts with less than 4 trades for wrap accounts over the most recent 21-month period. The IAR must review the account and make the determination as to whether the wrap account remains an appropriate option for the client and immediately implement one of the following alternatives: 1. Perform a rebalance of the account. Any trading should be completed in the best interest of the client and not merely to justify the use of a wrap account. 2. Transition the account to a non-wrap advisory account, a Third-Party Manager account, or Retail Brokerage account.</p> <p>24-month Flag: At this time the Home Office will terminate billing for the account and a termination letter will go out to the client.</p>	Account Periodic	Retained electronically by TRS.	N/A (retained electronically by Firm).

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Checks & Securities	<p>Ensure checks and/or securities are blotted and forwarded to the clearing firm or product sponsor by a trackable method. Checks/securities must be forwarded on the date received. If received after business hours, the checks and/or securities must be maintained in a secure location and forwarded by noon the next business day. If you receive a physical check or security certificate from a client for payment or deposit into an account, the check or security should be logged in the Checks and Securities Log within one business day, but no later than three business days following the day of receipt. You must include all information required on the check or securities log.</p>	Monthly	<p>A copy of the front and back of the check must be maintained if endorsed. Checks and securities must be forwarded on the date received. If received after business hours, check/security must be maintained in a secure location and forwarded by noon the next business day. Checks and securities should be logged within one business day, but no later than three business days following the day of receipt, using Account Blotters app on OneHub or Document Management.</p> <p>Any physical checks and securities forwarded from the branch are to be sent via a trackable vendor (i.e., FedEx, UPS, USPS Priority Mail Express, NetX360 Mobile app, etc.) A copy of the tracking label/receipt/mobile confirmation must be maintained along with a copy of the check in the branch's centralized Checks and Securities file. The Checks and Securities report must be printed on a monthly basis and is found in the On Demand Reports link on OneHub.</p> <p>If both the Financial Professional and Manager subscribe to Document Management the process can be completed and documented electronically.</p>	OneHub, Hard Copy or Document Management	Client file and checks & securities centralized branch file. Or, if using Document Management, client file with branch file and log created automatically.	3 years; first 2 years maintained on site. N/A if using Document Management.

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<p>Variable Annuity, Fixed Indexed Annuities and Registered Index Linked Annuities Initial Purchases and Replacements</p>	<p>Financial Professionals must submit all business Variable Annuity (VA) / Registered Indexed Linked Annuity (RILA) / Fixed Indexed Annuity (FIA) business that requires pre-approval through Annuity Submission Platform (ASP)</p> <p>If submitting an annuity that is a rollover for pre-approval, you will also need to submit a Rollover Transfer Disclosure Form (RTDF) with the Annuity Suitability Packet to Sales Supervision.</p> <p>Paper applications will no longer be reviewed through Support Center, with the exception of carriers that do not participate in ASP.</p>	<p>Ongoing</p>	<p>Complete the applicable VA-RILA-FIA Pre-Approval Packet and other required documentation – ensure that the client has signed and dated all required forms. Please note that any changes require client's initials and date. After the paperwork is imaged, indexed and routed to a trade specialist, an automatic notification via ServiceNet will be sent out to the financial professional acknowledging receipt of the paperwork. Once approved, financial professional must send the completed application and promptly transmit any checks held by the financial professional to fund the transaction along with any supporting documentation to the sponsor.</p>	<p>RightBridge, Document Management or Annuity Submission Platform (ASP)</p>	<p>Retain a copy of the Approval Notice and accompanying documentation in the client's file. Approvals for transactions approved in Salesforce/Support Center will be retained electronically. Document Management users can process and retain Annuity records electronically.</p>	<p>6 years; first 2 years maintained onsite or in Document Management.</p>
<p>Variable Annuity, Fixed Indexed Annuities and Registered Index Linked Annuities Subsequent Purchases</p>	<p>Financial Professional must log all subsequent purchases made into existing VAs, existing Fixed Indexed Annuities and existing Index Linked Annuities into the Account Blotter in OneHub. Pre-approval is required if the funds are the result of an annuity replacement.</p> <p>** RightBridge report/Rollover Transfer Disclosure Form (RTDF) may also be required.</p>	<p>Ongoing</p>	<p>Financial Professionals should process subsequent purchases directly with the carrier and enter the transaction into the Account Blotter system on OneHub sidebar, so the transaction will populate into the TRS system.</p> <p>Financial Professionals are responsible for ensuring both the transaction and the check are blotted into Direct Order Entry.</p>	<p>Account Blotters and Annuity Submission Platform (ASP)</p>	<p>Paper File or Document Management client file and checks &amp; securities branch file.</p>	<p>3 years; first 2 years maintained onsite or in Document Management.</p>

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Alternative Investments	Financial Professional must complete product specific course on AI Insight training prior to solicitation. Financial Professional must send into the Home Office, a client signed and completed Pre-approval packet and any supporting documentation.	Ongoing	Financial Professional must send into the Home Office, a client signed and completed Pre-approval packet and any supporting documentation. Final written pre-approval will be provided by the Home Office. Once approved, Financial Professional must send the completed application with any supporting documentation, and any checks by noon the next business day.	Support Center AI Insight or Document Management	Approvals for transactions approved in Support Center will be retained electronically. Document Management users can process and retain records electronically.	6 years; first 2 years maintained onsite or in Document Management.
Account Statements	Direct non-brokerage accounts generating statements must be maintained. Pershing brokerage account statements are retained on NetX360 or Wealthscape for NFS.	Ongoing	Non-Brokerage: retain hard copy, firm approved electronic storage system (ESS) or sponsor website. Brokerage: retained electronically on NetX360 or Wealthscape.	Hard Copy, ESS, or Sponsor Website	Non-Brokerage: Retain in hard copy, ESS, Document Management, or sponsor website.  Brokerage: Retained in Hard Copy, ESS, Document Management, NetX360 or Wealthscape.	6 years, with the first 3 years maintained onsite.  Brokerage: N/A retained electronically by Firm.
Advertising and Public Appearances	Submit Retail Communications, Social Media, and Advertising materials for approval via RegEd/Advertising Submission	Ongoing	Submit materials for approval via RegEd.  All public appearances need to include event date, time and location of the event.	RegEd	All submissions, correspondence and approvals are retained electronically in RegEd (Advertising Supervision).	If maintained in hard copy, 3 years; first 2 years maintained onsite.

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Signature Guarantee (Financial Professional has a stamp)	When a document needs to be signature guaranteed, the Financial Professional with a stamp should make a copy of the documentation used to identify the client (driver's license, government-issued ID card (Medicare, military ID, etc.) or other acceptable means of identification) and keep a copy of the guaranteed document to be maintained in the Signature Guarantee Log. The Financial Professional logs the guaranteed document in the Signature Guarantee log in the "the Account Blotters app" located on your OneHub sidebar.	Monthly	<p>The Signature Guarantee Log is found in the On Demand Reports link on OneHub, and must be printed on a monthly basis and maintained in the Signature Guarantee Log file along with a hard copy of all documentation. If both the Financial</p> <p>Professional and Manager subscribe to Document Management the process can be completed and documented electronically.</p>	OneHub, Hard Copy, Document Management and ESS	Client file and Central Signature Guarantee Log File, copies need to be maintained by guarantor.	6 years; first 3 years maintained onsite.
Signature Guarantee (FLS has a stamp)	The Financial Professional should make a copy of the documentation used to identify the client (driver's license, government-issued ID card (Medicare, military ID, etc.) or other acceptable means of identification) and forward to their FLS along with the documents being signature guaranteed. The Signature Guarantee Certification form must be completed for items requiring a signature guarantee when forwarded to the FLS, include a pre-addressed, stamped envelope in which to forward the document.	Ongoing	Forward document(s) to be signature guaranteed, a copy of the signature guarantee certification form, and a pre-addressed, stamped envelope in which to forward the document to your FLS.	OneHub, Hard Copy, Document Management and ESS	Client file and Central Signature Guarantee Log File, copies need to be maintained by guarantor.	6 years; first 3 years maintained onsite.

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Signature Guarantee (FP and FLS no stamp)	Financial Professional should make a copy of the documentation used to identify the client (driver's license, government-issued ID card, (Medicare, military ID, etc.) or other acceptable means of identification), the documents being signature guaranteed, and the Signature Guarantee Certification form.	Ongoing	Forward document(s) to be signature guaranteed, a copy of the signature guarantee certification form, and a pre-addressed, stamped envelope in which to forward the document to the Home Office address listed on the form.	OneHub, Hard Copy, Document Management, and ESS.	Client file, copies need to be maintained by guarantor.	6 years; first 3 years maintained onsite.
Outside Business Activities	All registered persons must disclose outside business activities in RegEd using the OBA questionnaire and receive prior approval from their FLS/Home Office.	Ongoing	One can disclose or update your outside business activities by clicking on the 'OBA Manager' link in the left-hand navigation of the RegEd website. Only updates to current activities are required once approved. Concurrent with disclosing or updating any OBAs, you are required to also ensure that 'Section 13' or the 'Other Business' Section in your FINRA Form U4 is updated to reflect all changes (you can view your Form U4 by clicking on the 'View U4' link in the left-hand navigation of the RegEd website). If U4 does not get updated, please open a Support Center ticket.	RegEd	Retained electronically in RegEd.	Any notes of documentation not captured in RegEd must be maintained for a period of 3 years from the date of the Financial Professional's termination.

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Complaints, Legal Matters, and Regulatory Inquiries	Representatives must immediately notify the Complaint Handling Team upon receipt of any complaint, whether verbal or written. Under no circumstances should a representative or their FLS attempt to settle a complaint without coordinating with the Complaint Handling Team.	Ongoing	Representatives must immediately notify the Complaint Handling Team upon receipt of any complaint, and forward to <a href="mailto:complaint@osaic.com">complaint@osaic.com</a> .  Department Phone: 800-821-5100 Fast Track ext. 3, 5, 2, and notify your First Line Supervisor.  Legal and regulatory inquiries should be immediately forwarded to Broker-Dealer Compliance and the First Line Supervisor.	N/A	Branch Complaint file is kept either in hard copy, ESS, or in Document Management.	6 years – 3 years onsite. N/A if using Document Management.
Gifts and Entertainment Log	Maintain the gift and entertainment log (available on OneHub) of all gifts to and from clients and/or vendors.	Ongoing	Gifts may not exceed \$100 annually per individual/client. Gifts that are given for infrequent life events (e.g., a wedding gift or a gift for the birth of a child, bereavement gifts) are not subject to the gift limit restrictions or recordkeeping requirements.	Hard Copy, Document Management	Gifts and gratuities log should be retained in branch file either in hard copy, ESS, or Document Management.	6 years – 3 years onsite. N/A if using Document Management.
Audit Resolution Questionnaire (ARQ)	Financial Professional must document any deficiency resolution from Branch Exam.	As Required	Person in charge and/or Satellite Manager must submit an ARQ within 30 days after the receipt of the Branch Exam close out letter. Financial Professional must document any deficiency resolution and submit on RegEd.	RegEd	Retained in RegEd with any additional documentation retained in branch exam file	N/A (maintained on RegEd).
ADV Disclosures	Every IAR must deliver to each new advisory client the RIA's Form ADV Part 2A and 2B ("Part 2A/2B")	Annually and/or as required	The IAR must deliver Part 2A/2B before or at the time that the IAR begins to provide advisory services to a Client. The IAR also must also deliver to Clients an updated Part 2B supplement should any material changes occur.	Hard Copy, Document Management WMP or RegEd	Retained in branch file either in hard copy, ESS, or Document Management.	3 years; first 2 years maintained onsite.

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Annual Compliance Requirements	Complete the assigned firm element courses, questionnaires and certifications annually by the firm due date.	Annually	Log into RegEd and FinPro and complete Continuing Ed courses annually.  Log into ECM to complete account and holding certifications.	RegEd, ECM and FinPro	Retained in RegEd, ECM and FinPro.	N/A, Retained in RegEd, ECM and FinPro.
Annual Compliance Meeting	Each Financial Professional needs to complete an ACM prior to the firm deadline.	Annually	Attend an Annual Compliance Meeting (ACM) at a Firm-sponsored event or complete the ACM conducted by a Firm-designated Licensed Principal, your OSJ Branch Manager, or one of your OSJ Branch Manager's FLSs. There will also be an "On Demand" session in RegEd.	RegEd	Retained in RegEd	N/A, Maintained by RegEd.