

FINRA is expanding its permissive registrations to include *all* associated persons, including those working solely in a clerical or ministerial capacity. Previously, firms were only allowed to register or maintain the registrations of certain types of job functions (e.g., technology department employees).

These changes take effect October 1, 2018.

Registered individuals will be subject to all FINRA rules that are relevant to their activities, such as Rule 3270 (Outside Business Activities). In addition, these individuals will have to satisfy all FINRA Continuing Education requirements.



What Firms Need to Do

Firms must assign a registered supervisor to those individuals who will be required to periodically contact the individual's day-to-day supervisor to verify that the individual is not acting outside the scope of his/her assigned function.

Two important changes to note:

1. A registered representative can supervise these individuals.
2. The registered supervisor does not need to have the same registration category as the individual (e.g., a Series 6 can supervise a Series 7 employee, a Series 79/24 can supervise a Series 6 employee).

How Oyster Can Help

Oyster Consulting can review your firm's registrations to ensure they are compliant with the changing regulation and can conduct a review of your firm's Branch Exam program, including a review of employee records and outside business activities. Our consultants can also assist with amending policies and procedures to reflect the new registration requirements. Our experts have years of industry experience and can quickly assess through thoughtful and skillful questions what areas of your firm need the most attention and review. Oyster's team can help you facilitate those changes through support staffing or by taking on the initiative entirely.

For more information about how Oyster can assist your firm, please complete our [contact form](#), or call (804) 955-5400 and one of our [Relationship Managers](#) will be happy to help you.