

Annual Filings Made Easy: 5 Tips To Streamline Processes and Reduce Risk



A new year means one thing for CCOs everywhere: annual filing requirements.

Each year, advisory firms are expected to submit certain paperwork and update information on file with the SEC to remain in compliance. And while firms may differ in the specifics of their filings, there are some requirements that are universal.

What's also universal, it seems, is the sense of stress annual filings can bring. A mistake in filing now can lead to trouble down the line, especially if you miss your deadlines or file incorrect information that's later audited as part of an exam.

That's why right now is the perfect time to ensure you're ready to hit all the right marks with your annual filings. These tips can help keep you audit-ready now and throughout the year.

1. Know What You Need To File: Form ADV and CRS Requirements

You can't succeed at your annual filings if you don't know what needs to be submitted.

Different firms are subject to different filing requirements, so make sure you educate yourself on the types of filings required of your firm. These annual filings may include:

- Schedule 13D/G
- Form 13F
- Form 13H
- Form PF
- Form D

Depending on your location, you may have state-specific requirements as well.

While some requirements differ from firm to firm, others are universal. Form ADV Parts 1 and 2, and Form ADV Part 3 — also known as Form CRS — are guaranteed to be a part of your firm's annual filing requirements.

All three parts of Form ADV must be filed with SEC when you first register your firm, then updated and re-submitted annually.

These updates require a review of and edits to annual client disclosures and communications, so be sure you leave yourself ample time to complete this process!

2. Set Internal Due Dates

Hitting filing deadlines is easier when you break your big project down into smaller tasks.

Working backward from your filing date, schedule internal due dates for different components of the project. When deciding what to assign to whom, ask yourself questions like:

- How much time will it take to review current disclosures, and who is responsible for that task?
- Who will determine what needs to be edited, and who will undertake the actual task of editing?
- Who will need to review and approve those edits?
- Which stakeholders will need to review and give final sign-off before submitting the updated documents?

This is where a shared calendar can come in handy. Within Orion Compliance, CCOs have the power to assign tasks, set due dates, and monitor progress on

tasks to ensure everyone hits their internal deadlines.

3. Rely on a Single Source of Truth

Ultimately, it's the CCO who's responsible for ensuring all filing deadlines are hit and all of the work is done correctly.

When you establish due dates in your shared calendar, include detailed information each assignee will need to complete their tasks. Share links to current disclosure documents, and include any relevant SEC risk alerts or updated guidance that might impact edits.

Orion Compliance makes it easy for your entire team to access your secure document library, which houses all the necessary compliance paperwork. Plus, it provides visibility into who else is working on the project, so individuals know who they can go to with questions.

A shared workspace makes it easier for your team to collaborate. And as CCO, you can identify any logjams quickly to keep things moving at the correct pace.

4. Identify and Schedule Other Annual Compliance Tasks

A CCO's work is never done, and while you're thinking about annual filings, it's not a bad idea to consider other yearly compliance tasks that may not have a firm deadline.

You know you must undertake a thorough review of your policies and procedures each year. Now is the perfect time to set up a workflow and deadlines for that significant undertaking.

By establishing the plan for all annual reviews and processes at the start of the year, you can space out your workload over the next 12 months, instead of ending up with a backlog of critical tasks come December.

5. Get Your Annual Compliance Meetings on the Books

FINRA requires all registered representatives and principals to participate in an annual compliance meeting. This is an opportunity for them to review policies and procedures that are relevant to their job, and to address any questions or concerns.

As the months go on, individual calendars get crowded and it becomes more difficult to coordinate schedules for meetings. This, however, is not a meeting you can postpone indefinitely.

Take time at the start of the year to get this meeting on the books. If you'd prefer to offer this meeting some other way, FINRA allows firms to use on-demand video and other asynchronous training methods to comply with this requirement.

If you'd prefer to rely on videos and quizzes to educate your team, now is the time to create those materials and let everyone know how they can access the content.

Orion Compliance makes it easy for firms to share educational material and run internal skills and drills testing, which you may wish to leverage as part of your annual compliance meeting requirement.

Managing a healthy, robust compliance program year-round is all about pacing yourself. Invest time in January to establish a reasonable cadence for hitting regulatory deadlines and managing necessary processes and procedures. A proactive plan takes a bit of effort to create, but it saves you mountains of time (and stress!) in the end.

If you're looking for a comprehensive compliance software solution to support your program year-round, **let us show you how Orion Compliance can help.**