

CCO Checklist

July 2021	Date Completed
<p>Continue Working Through Annual Risk Assessment- Refer to CRP Risk Matrix (Sent in our June TMIC email). The task is to perform a risk assessment on certain topics over the next few months (June – August). If you identify an area of high risk to your firm, you will be expected by regulators to address those risks and conflicts with policies and procedures. -<i>Annually</i></p>	<input type="checkbox"/>
<p>Confirm Custodial Statements- Contact custodian to confirm delivery of client account statements (required to form reasonable belief, upon due inquiry, that statements are being sent). - <i>Annually</i></p>	<input type="checkbox"/>
<p>Due Diligence of Service Providers- Annual review and due diligence of service providers; specifically, their services to the firm and fees paid. -<i>Annually</i></p>	<input type="checkbox"/>
<p>Social Media Review and Forensic Testing- Review Social Media accounts for IARs and confirm LinkedIn Endorsements have been shut off for any new hires over the last year. Print off profile, review and file. Forensic testing should include "Googling" your firm name, DBA names and employee names to determine if additional social media sites exist and identify any that were not approved by Compliance. <i>Annually</i></p>	<input type="checkbox"/>
<p>Third Party Billing Software Review-Review random sampling of the calculation of fees by a third party and document if your firm uses third party billing software. <i>Annually</i></p>	<input type="checkbox"/>
<p>Quarterly Attestation Review including Quarterly Personal Securities Transaction Reports, Political Contributions – Refer to the CRP Compliance Questionnaire document. It is to be completed by all Associated Persons each quarter. This is a required document and must be kept on file. -<i>Quarterly</i></p>	<input type="checkbox"/>
<p>Review Billing Statements/Fee Calculations Report- Review billing statements/fee calculations report from custodian or billing program; take any necessary corrective action and document review; maintain in books and records. This can be done monthly or quarterly.</p>	<input type="checkbox"/>
<p>Quarterly Compliance Meeting with Management -Review any compliance matters that have arisen since the last regular meeting. -<i>Quarterly</i></p>	<input type="checkbox"/>
<p>Review Best Execution Report- Obtain Best Execution Report from Custodian. Review and document review in file. -<i>Quarterly</i></p>	<input type="checkbox"/>
<p>Review Terminated Accounts- Obtain a report that allows you to verify that amounts refunded to terminated client accounts are accurate and in accordance with your firm's procedures. -<i>Quarterly</i></p>	<input type="checkbox"/>
<p>Review Trade Blotter- Download Report from Custodian and review for any irregular trading patterns or trade discrepancies. -<i>Monthly</i></p>	<input type="checkbox"/>
<p>Review of Company Financials- The CCO should review the company's accounting records to confirm the company is in compliance with its home state's net capital requirements. If the firm is SEC registered, please make sure the company is solvent at all times. - <i>Monthly</i></p>	<input type="checkbox"/>
<p>Correspondence and Email Review- Review staff correspondence, including email. -<i>Monthly</i></p>	<input type="checkbox"/>