

CCO Checklist

November 2021	Date Completed
<p>Review Revised 2021 DOL Rule and Determine Firm's Stance- Will your firm provide education only for client IRA Rollovers? Or, will your firm provide advice and recommendations? Choose firm stance and update Compliance Manual ERISA section with suggested language provided by CRP. Begin implementing the Comprehensive Rollover Analysis if relying on the PTE. <i>Annually</i></p>	<input type="checkbox"/>
<p>Notice Filing Review of States- Review number of households in each state. Most states follow the de minimus rule which allows SEC and state advisors to have up to 5 clients before requiring notice filing or registration. Some states require notice filing/registration when 1 client is present. These states are: Texas, Louisiana, New Hampshire and Nebraska. Notify CRP of any additional notice filings/registrations needed for your Firm. <i>Annually</i></p>	<input type="checkbox"/>
<p>ADV Annual Amendment Preparation (Review Item 4 Advisory Services & Item 5 Fees and Compensation)- Review Items 4 and 5 of your Part 2A Brochure in preparation of the Firm's Annual Amendment filing in Q1 2022. If changes are warranted, contact CRP to work through revisions. <i>Annually</i></p>	<input type="checkbox"/>
<p>Review Preliminary Renewal Statement from IARD- Review IARD Renewal Statement for annual state/individual registrations; CRP will send a copy for review; fund any balance due. <i>Annually</i></p>	<input type="checkbox"/>
<p>Federal Filings Review--**ONLY SEC Firms with \$100m+ Equities and ETFs** - Review Year-End Holdings Report for Potential 13-H/F/G/D Required Filing. Schedule 13D and certain 13G filings are required to be filed, at any time during the year, within 10 days of the initial triggering transaction and filing requirements remain continuous, not only at year end. Filing dates are usually 45 days after quarter-end. <i>Semi-Annually</i></p>	<input type="checkbox"/>
<p>Review of Client Portfolios- Random review of client portfolios for consistency with Client objectives, restrictions and asset allocations and any unusual variances from the benchmark. <i>Quarterly</i></p>	<input type="checkbox"/>
<p>Review Checks Received Blotter- Review the checks received/dispensed log for all client checks received by the RIA. The rule state these checks must be made payable to a third party (Custodian), then logged and forwarded to the appropriate third party by following business day. Client securities need to be delivered directly to the custodian by the client. <u>Investment Advisors CANNOT receive securities without taking custody.</u> If a client has securities to be delivered, it is best practice for you to provide an overnight package with a carrier that provides a tracking service (UPS / FedEx) to the appropriate third party. <i>Quarterly</i></p>	<input type="checkbox"/>
<p>Review Quarter-End Client Performance Reports- Select sample of client files to review quarter end performance reports. Compare these against Custodian statements to ensure accuracy of financial reporting. <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. <i>Monthly/Quarterly</i></p>	<input type="checkbox"/>
<p>New Account Review- Random sample of opened new client accounts in the last quarter to verify that account has been placed in a model to allocate its portfolio, compare the account's data to the client's paperwork and ensure the appropriate fee is billed. <i>Quarterly</i></p>	<input type="checkbox"/>
<p>Review Trade Blotter- Download Report from Custodian and review for any irregular trading patterns, trade discrepancies or large amounts of trading in one account. <i>-Monthly</i></p>	<input type="checkbox"/>

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>	<input type="checkbox"/>	
Correspondence and Email Review- Review staff correspondence, including email. - <i>Monthly</i>	<input type="checkbox"/>	

