

CCO Checklist

June 2021	Date Completed
<p>Begin Annual Risk Assessment- Refer to the attached, updated, CRP Risk Matrix. A risk assessment has become a standard document request for regulators and goes a long way in describing and developing your compliance program. It's a chance to review areas of your Manual and implement revised procedures, if necessary. We have broken down compliance areas into a Matrix. 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>Inspection of Branch Offices (if applicable)- Complete on-site branch exams and document in compliance file. CRP can assist with Sample Audit Checklist. - <i>Annually</i></p>	<input type="checkbox"/>
<p>Quarterly Review of States - Are you properly notice filed? You will need to be notice filed in any state where you have more than 5 households. The exceptions to this rule are the following states: Texas, Louisiana, New Hampshire, and Nebraska. Each of these states require notice filing when 1 household is present. Send a list of states that require notice filing to CRP so they can update your ADV accordingly. - <i>Quarterly</i></p>	<input type="checkbox"/>
<p>Mutual Fund Share Class Review- Are your firm's mutual fund holdings in the lowest available share class? If not, be sure there is documentation on the rationale for holding the higher share class. -<i>Quarterly</i></p>	<input type="checkbox"/>
<p>Review Cash Balance Report -Review cash balance report to determine if there is enough cash for fees or if there is too much cash and funds need to be invested. Be mindful of scheduled distributions. Perform random performance review and take note and action on any abnormal or unusual balances. - <i>Quarterly</i></p>	<input type="checkbox"/>
<p>Review Trade Blotter- Download Blotter from Custodian and review for any irregular trading patterns, trade errors, trade discrepancies or large amounts of trading in one account. This can be done weekly or monthly. <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"/>