

CCO Checklist

DECEMBER 2021		DATE COMPLETED
<p>Advertising File contains materials used in 2021 - Review business presentations, commentaries, websites, social media sites, and other marketing materials for all necessary disclosures, ensure all materials have been approved through Compliance and employees are using the most current versions. <i>Annually</i></p>	<input type="checkbox"/>	
<p>Annual Compliance Program Review - Under Rule 206(4)-7 in the Advisers Act, SEC-registered firms are required to adopt and implement written policies and procedures reasonably designed to prevent violation of the rules and regulations of the Advisers Act. Please see your CRP consultant for the 2021 Annual Compliance Review template for your Firm. <i>Annually</i></p>	<input type="checkbox"/>	
<p>Fund IARD renewal account - Required annually by CCO. <i>Annually</i></p>	<input type="checkbox"/>	
<p>Annual Standing Letters of Authorization (SLOA) Review - Request active SLOA report from your custodian. Determine the number of accounts and the value of the account as preparation for the Part 1 annual amendment. <i>Annually</i></p>	<input type="checkbox"/>	
<p>Client Annual Review Certification - Update client investment objectives, risk tolerance & profile. Use the following CRP form for documentation. See CRP template. <i>Annually</i></p>	<input type="checkbox"/>	
<p>Review Business Continuity Plan and Update Critical Business Vendor Information - Ensure all information on the firm's business continuity plan is current and accurate. For critical business vendors, be sure to include their name, service and/or product, address and phone number along with any alternative supplier names and contact information. <i>Annually</i></p>	<input type="checkbox"/>	
<p>Mutual Fund Share Class Review - Are your mutual fund holdings in the lowest available share class? Document your review for your compliance file. <i>Quarterly</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>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 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>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. <i>Monthly</i></p>	<input type="checkbox"/>	
<p>Correspondence and Email Review - Review staff correspondence, including email. <i>Monthly</i></p>	<input type="checkbox"/>	

YEAR END CHECKLIST		DATE COMPLETED
Tailoring of the 206(4)-7 Annual Review – Review and Document Compliance Program Review. <i>CRP Resource: Refer to November 2021 TMR and November 2020 SEC Risk Alert</i>	<input type="checkbox"/>	
Fund IARD Registration Fees for 2022 <i>CRP Resource: Refer to Firm’s Renewal Statement sent by CRP week of Nov 8th</i>	<input type="checkbox"/>	
Conducted Risk Assessment - Are all Firm conflicts reported on ADV, addressed in Agreement? <i>CRP Resource: Refer to TMIC in June, July, August 2021</i>	<input type="checkbox"/>	
Updated Firm’s Policies and Procedures Manual <i>CRP Resource: Refer to October 2021 TMR</i>	<input type="checkbox"/>	
Reviewed Business Continuity Plan (BCP) with any updates, document testing of the Plan <i>CRP Resource: Refer to May 2021 TMIC</i>	<input type="checkbox"/>	
Reviewed Cybersecurity Plan and testing of the Cybersecurity Plan Review in 2021 (include the strength of remote access protocols, the security levels of personal computers and home wireless connections, results of Penetration and Phishing tests) <i>CRP Resource: Refer to May 2021 CCO Scorecard</i>	<input type="checkbox"/>	
Reviewed Due Diligence conducted on Third Party Vendors , maintain list, and updated as necessary. <i>CRP Resource: Refer to September 2021 TMIC</i>	<input type="checkbox"/>	
Conducted training via Annual Compliance Meeting . (Code of Ethics, Annual Employee Acknowledgements and Certifications) <i>CRP Resource: Refer to October 2021 TMIC</i>	<input type="checkbox"/>	
Confirm Advertising File contains materials used in 2021, Review business presentations, commentaries, websites, social media sites, and other marketing materials for all necessary disclosures, ensure all materials have been approved through Compliance and employees are using the most current versions. <i>CRP Resource: Refer to December 2021 CCO Scorecard</i>	<input type="checkbox"/>	
Obtain all Form U-4 updates and review and Form ADV Part 2Bs, as applicable - confirmed that information is accurate. <i>CRP Resource: Refer to September 2021 CCO Scorecard</i>	<input type="checkbox"/>	
Review listing of Alternative/Complex Exchange Traded Products - Review client list of those who hold such products. <i>CRP Resource: Refer to August 2021 TMIC</i>	<input type="checkbox"/>	