

Information Notice

2020 and First Quarter of 2021 Report Filing Due Dates:

Annual Report; FOCUS; Form Custody; Supplemental Statement of Income (SSOI); Supplemental Schedule for Derivatives and Other Off-Balance Sheet Items (OBS); and Supplemental Inventory Schedule (SIS)

Summary

To assist members in their financial reporting obligations, FINRA is issuing this Notice to provide the due dates for Annual Report, Financial and Operational Combined Uniform Single (FOCUS), Form Custody, and supplemental FOCUS Report filings that are due in 2020 or the first quarter of 2021.¹ Members are reminded that all such filings submitted to FINRA must be made electronically through FINRA's Firm Gateway.

The due dates set forth in this *Notice* are solely as to the filings that are specified in the *Notice* and required under SEA Rule 17a-5 or FINRA Rule 4524. These due dates take into account the federal holiday calendar as appropriate.

Questions regarding this *Notice* should be directed to your firm's [Regulatory Coordinator](#).

Background

Annual Report

Firms must submit their annual reports to FINRA in electronic form.² Pursuant to SEA Rule 17a-5(d)(6), firms must also file the report at the regional office of the SEC in which the firm has its principal place of business and the SEC's principal office in Washington, DC. Members are reminded that the SEC has a process for electronic filing of annual reports, in lieu of filing in paper form, which the SEC simplified and updated in January 2017.³

November 11, 2019

Suggested Routing

- ▶ Compliance
- ▶ Legal
- ▶ Operations
- ▶ Regulatory Reporting
- ▶ Senior Management

Key Topic(s)

- ▶ Annual Report Filings
- ▶ FOCUS Report Filings
- ▶ Form Custody Filings
- ▶ Supplemental Inventory Schedule
- ▶ Supplemental Schedule for Derivatives and Other Off-Balance Sheet Items
- ▶ Supplemental Statement of Income

Referenced Rules and Notices

- ▶ Regulatory Notice 11-46
- ▶ Regulatory Notice 12-11
- ▶ Regulatory Notice 14-43
- ▶ Regulatory Notice 16-11
- ▶ Regulatory Notice 17-07
- ▶ SEA Rule 17a-5

Rule 17a-5(d)(6) requires firms that are members of the Securities Investor Protection Corporation (SIPC) to file the annual report with SIPC. Members are reminded that in August 2017, SIPC and FINRA announced an agreement designed to ease reporting burdens and compliance costs for firms.⁴ Pursuant to the agreement, when a firm that is a SIPC member files an annual report through FINRA's Firm Gateway on or after September 1, 2017, this will also constitute filing with SIPC. Members may consult the [SIPC website](#) for further information.

Filings are due no later than 11:59 p.m. Eastern Time (ET) on the due dates listed in this *Notice*.

Annual Reports

Period Ending	Due Date
November 30, 2019	January 29, 2020
December 31, 2019	March 2, 2020
January 31, 2020	March 31, 2020
February 29, 2020	April 29, 2020
March 31, 2020	June 1, 2020
April 30, 2020	June 29, 2020
May 31, 2020	July 30, 2020
June 30, 2020	August 31, 2020
July 31, 2020	September 29, 2020
August 31, 2020	October 30, 2020
September 30, 2020	November 30, 2020
October 31, 2020	December 30, 2020
November 30, 2020	January 29, 2021
December 31, 2020	March 1, 2021

FOCUS Reports

Firms must submit their FOCUS Reports electronically through the eFOCUS System available via the FINRA Firm Gateway. For information about completing the FOCUS Report, please see the [FOCUS Report submission guidance](#).

Monthly and Fifth⁵ FOCUS Part II/IIA Filings

Period End	Due Date
January 31, 2020	February 26, 2020
February 29, 2020	March 24, 2020
April 30, 2020	May 26, 2020
May 31, 2020	June 23, 2020
July 31, 2020	August 25, 2020
August 31, 2020	September 24, 2020
October 31, 2020	November 25, 2020
November 30, 2020	December 23, 2020

Quarterly FOCUS Part II/IIA Filings

Quarter Ending	Due Date
December 31, 2019	January 27, 2020
March 31, 2020	April 23, 2020
June 30, 2020	July 24, 2020
September 30, 2020	October 26, 2020
December 31, 2020	January 27, 2021

Annual Schedule I Filings

Period	Due Date
2019	January 27, 2020
2020	January 27, 2021

Form Custody

Firms are required to file Form Custody pursuant to SEA Rule 17a-5(a)(5).

Form Custody Filings

Quarter Ending	Due Date
December 31, 2019	January 27, 2020
March 31, 2020	April 23, 2020
June 30, 2020	July 24, 2020
September 30, 2020	October 26, 2020
December 31, 2020	January 27, 2021

Supplemental Statement of Income (SSOI)

Firms must file the SSOI on a quarterly basis.⁶

SSOI Filings

Quarter Ending	Due Date
December 31, 2019	January 30, 2020
March 31, 2020	April 28, 2020
June 30, 2020	July 29, 2020
September 30, 2020	October 29, 2020
December 31, 2020	February 1, 2021

Supplemental Schedule for Derivatives and Other Off-Balance Sheet Items (Form OBS)

Unless subject to the *de minimis* exception, the Form OBS must be filed by (1) all FINRA member firms that self-clear their proprietary transactions or clear transactions for others or carry customer accounts; and (2) all other FINRA member firms that have, pursuant to SEA Rule 15c3-1, a minimum dollar net capital requirement equal to or greater than \$100,000 and at least \$10 million in reportable items pursuant to the Form OBS.⁷ Any firm that is required to file the Form OBS must do so as of the last day of a reporting period within 22 business days of the end of each calendar quarter by using the eFOCUS system. A firm that claims the *de minimis* exception must affirmatively indicate through the eFOCUS system that no filing is required for the reporting period. For more information on the Form OBS, including Frequently Asked Questions, please see the [Derivatives and Other Off-Balance Sheet Items \(OBS\)](#) page.

Form OBS Filings

Quarter Ending	Due Date
December 31, 2019	February 3, 2020
March 31, 2020	April 30, 2020
June 30, 2020	July 31, 2020
September 30, 2020	November 2, 2020
December 31, 2020	February 3, 2021

Supplemental Inventory Schedule (SIS)

The SIS must be filed by a firm that is required to file FOCUS Report Part II, FOCUS Report Part IIA or FOGS Report Part I, with inventory positions as of the end of the FOCUS or FOGS reporting period, unless the firm has (1) a minimum dollar net capital or liquid capital requirement of less than \$100,000; or (2) inventory positions consisting only of money market mutual funds.⁸ A firm with inventory positions consisting only of money market mutual funds must affirmatively indicate through the eFOCUS system that no SIS filing is required for the reporting period.

SIS Form Filings

Month Ending	Due Date
December 31, 2019	January 30, 2020
January 31, 2020	March 2, 2020
February 29, 2020	March 27, 2020
March 31, 2020	April 28, 2020
April 30, 2020	May 29, 2020
May 31, 2020	June 26, 2020
June 30, 2020	July 29, 2020
July 31, 2020	August 28, 2020
August 31, 2020	September 29, 2020
September 30, 2020	October 29, 2020
October 31, 2020	December 1, 2020
November 30, 2020	December 29, 2020
December 31, 2020	February 1, 2021

FINRA Gateway and Entitlements

Firms are reminded that they must use their current FINRA entitlement user ID and password to access the Firm Gateway. Questions regarding access to the Firm Gateway should be directed to the firm's Super Account Administrator (SAA). Questions regarding the filing of reports, the resetting of passwords or general technical concerns regarding system requirements should be directed to FINRA Business and Technology Support Services at (800) 321-6273.

Endnotes

1. All such filings must be received by FINRA by their required due dates to avoid specified fees as set forth in Schedule A to FINRA's By-Laws and to avoid suspension of FINRA membership.
2. See [Regulatory Notice 11-46](#) (Annual Audit Reports: FINRA to Require Electronic Submission of Annual Audit Reports) (October 2011).
3. See [Electronic Filing of Broker-Dealer Annual Reports](#) on the SEC website; see also [Regulatory Notice 17-07](#) (Updated SEC No-Action Guidance and Instructions on Electronic Filing of Broker-Dealer Annual Reports) (February 2017).
4. See FINRA News Release, [SIPC and FINRA Streamline Reporting Process for Broker-Dealers](#) (August 1, 2017).
5. A Fifth FOCUS Report is an additional report that is due from a member firm whose fiscal year end is a date other than a calendar quarter.
6. See [Regulatory Notice 12-11](#) (Supplemental FOCUS Information) (February 2012).
7. See [Regulatory Notice 16-11](#) (Supplemental FOCUS Information) (April 2016).
8. See [Regulatory Notice 14-43](#) (SEC Approves Supplemental Inventory Schedule) (October 2014).