

# memo

**To:** IAR CE Stakeholders  
**From:** NASAA Regulatory Systems and Services Department  
**Date:** November 1, 2024  
**Re:** IAR CE End of Year Processing

---

**When will emails be sent to FinPro users notifying them they still have an outstanding IAR CE requirement?**

September 30<sup>th</sup>, November 30<sup>th</sup>, and December 15<sup>th</sup>

**Why are the reminders limited to FinPro users?**

The Form U4 does not ask the investment adviser representative (IAR) to list their email address. Therefore, NASAA is limited to those that have a FinPro account set up. FinPro is a free tool owned by FINRA and is available to all IARs and broker-dealer agents.

**Will the IA firm the IAR is associated with receive any type of notification regarding their associated IARs?**

Yes, IA firms can generate their own reports at any time using IARD. In addition, FINRA, on behalf of NASAA will be emailing firms on October 17, November 21, and December 5 to notify them of their IARs that are at risk of failing to renew for IAR CE purposes. These notices will be sent to the firm contact listed on the firm's ADV.

**When is the last day to submit course completion rosters for guaranteed 2024 processing?**

The CRD system will stop processing rosters on December 26<sup>th</sup> at 6:00 PM Eastern time (CRD System Shutdown). All course rosters submitted prior to then will be processed and included in the 2024 renewal process.

**What if a roster is submitted between December 27 – December 31?**

Those course rosters will still be accepted by the system but will not be processed until the system comes back up on January 2, 2025.

**If an IAR waits to complete their CE until that downtime, will their 2025 registration be impacted?**

It depends. If the IAR is caught up on their requirement with the exception of the 2024 year, and are in a “Required” CE status, then no, they will not systematically lose their registration. Their registration status will change to Approved Pending IAR CE on January 2, 2025. Based on the model rule, this is still an approved registration status. Once the courses process on January 2, their registration will automatically change back to Approved.

However, if the IAR is deficient two years (e.g. 2023 and 2024) and are in a “CE Inactive” CE status at the time of the CRD System Shutdown (December 26 at 6:00 PM ET), yes, their registration will fail to renew on January 2. Once the course rosters are processed and the IAR is no longer deficient CE, on January 2, the IAR can submit a new Form U4 and seek registration again.

**How can an IAR verify their IAR CE status?**

An IAR can review their status, monitor course completions, and many other things through the Financial Professional Gateway (FinPro).

**If an IAR wants to take one of the free courses hosted by NASAA, what is the last day those will be available for inclusion in 2024 processing?**

NASAA courses completed by midnight on December 22 will be submitted for processing prior to the CRD System Shutdown (December 26 at 6:00 PM ET). Courses taken after December 22 will not be processed until the system comes back online on January 2, 2025.

If you have any additional questions or concerns about the details in the memo, please contact the IAR CE team at [IARCE@nasaa.org](mailto:IARCE@nasaa.org).