

IARD

Form ADV Part 3 (Form CRS)

About Form ADV Part 3

On June 5, 2019, the SEC adopted new rules and forms to require broker-dealers and investment advisers to provide a brief relationship summary, <u>Form CRS</u>, to retail investors. This guide is provided to firms registered with SEC as an Investment Adviser or Dual BD/IA to assist in the Form CRS upload process.

Dual BD/IA firms can login to either Web CRD or IARD to submit their relationship summary. Dual BD/IA firms with no retail on the IA side will stay in Web CRD to upload Form CRS, and Dual BD/IA firms with retail on both sides will be redirected to IARD to submit Form ADV Part 3. (If a Dual BD/IA firm believes they have been redirected incorrectly, please contact the Gateway Call Center at 301-869-6699 or <u>WebCRD@finra.org</u>.) Dual BD/IA firms will only upload one PDF file – either a four-page combined relationship summary, or two separate two-page summaries saved to a single file. Additional Form CRS requirements are available <u>here</u>.

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Questions on IARD? Call the IARD Hotline at 240-386-4848 8 A.M. - 8 P.M., ET, Monday through Friday.

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Access Form ADV

Login to IARD at <u>https://crd.finra.org/iad</u> or through Firm Gateway at <u>https://firms.finra.org</u> with your current user ID and password.

From the IARD site map, click the **New/Draft Filing** link in the Forms column or click the **Forms** tab at the top of the page.

FINCA		
IARD [™] ∖		
CRD Main IARD Main Forms	Organization Reports	
Site Map User Info		
IARD Main	Forms	Organization
User Info	ADV	View Organization
FAQ - IARD.COM	New/Draft Filing	Brochure Search
FAQ - NASAA.ORG	Generate a Private Fund Identification Number	Identifying Information
FAQ - SEC.GOV		Registration/Reporting Status
	Historical Filing	
Release Notes	A DV-W	Notice Filing Status
IA Setting and Standard Fees	New Filing	Brochure Status
Recommended Browsers	Pending Filing	Relationship Summary
Send Comments	Historical Filing	Answers to Questions

Select the appropriate Form ADV filing type (including sub-type, if applicable) and click the **Create New Filing** button at the bottom of the page.

FINCA					≜ Use	Change Password/Profile Log er: I Organization:	Out
IARD T	м						
IARD Main	Forms	Organization	Reports				
Form ADV	Form ADV-	W Form ADV-E	E			? 🎒 Printer F	Friendly
Select /	ADV Filing t Filing			Create a	a New ADV Filir	ng	
 Historical Fi 	iling	What filin	ng(s) do you wa	nt to make? More than one r	nay be selected.		
		Subm	nit an Amendmen	t			
		0,	Annual Updating	Amendment for Fiscal Year er	nded December,		
		۱	Other-Than-Annu	al Amendment			
		Apply	for registration	as an investment adviser wit	h one or more States		
		Note: To s submitted	switch from filing d that withdraws y	as a SEC-registered adviser to rour registration with the SEC	filing as an Exempt Repo before you may file your	rting Adviser, a Form ADV-W must be first report as an Exempt Reporting Adviser.	
_		Create Ne	ew Filing				

Part 3 Relationship Summary

Once the draft ADV filing has been opened, SEC-registered firms will have an additional **Part 3** link on the left navigation panel. Click the **Part 3** link to proceed.

Tip: Investment Advisers registered with a state or jurisdiction (and not SEC) do not have a Form CRS filing requirement and will not have a link for Part 3.

Item 12 Small Businesses
Schedule A/C Direct
Owners/Executive Officers
 Schedule B/C Indirect
Owners
 Schedule D
 Schedule R
Part 2
Part 3 🔶
 Execution

The following page will display the firm's IA and Dual BD/IA Form CRS upload history, if any. Click the **Upload CRS** button to begin the Form CRS upload process.

Protect Personal Inform responding to more gener guidance provided on the	nation! Remember to only provide al questions that accept narrative Protecting Personal Information ir	e personal information about individuals in responses, use terms that do not disclose I Form ADV Filings page for more informati	response to specific questions th personal information (including a on.	at solicit that information. When ccount numbers). Please review the
CRS	Type(s)	Affiliate Info	Retire	Action(s)
		There are no CRS filings to di	splay.	
Upload CRS				

Reminder: Relationship summary uploads must meet the Form CRS requirements.

Part 3 Relationship Summary (Continued)

Complete the **Upload Relationship Summary** card. Fields marked with an asterisk (*) are required. Next, click Browse and select the appropriate file for upload (shown below). Users can also drag and drop the file into the **Upload PDF** box.

Upload Relationship Summary
Relationship Summary Type *
O Investment Adviser (Submit a Relationship Summary as an investment adviser discussing your advisory services.)
Dual Registrant (Submit a Relationship Summary as a Dual Registrant as defined in the Form CRS (Relationship Summary) instructions.)
I am submitting (2) separate Relationship Summaries in a single PDF, one discussing my advisory services and one discussing my brokerage services.
O I am submitting (1) combined Relationship Summary in a single PDF, discussing both my advisory and brokerage services.
Affiliate Information *
I am submitting a combined Relationship Summary discussing my firm's services and the services provided by an <u>affiliate</u> . I understand that my <u>affiliate</u> has a separate submission obligation.
Affiliate information is not applicable to my Relationship Summary submission.
Upload PDF *
Drag and drop files here or browse
Total (0) 0.00 MB
Cancel



Part 3 Relationship Summary (Continued)

Successfully uploaded files will show a "Success" indicator along with the file size. Otherwise, applicable error messages will display if the file does not meet the following technical specifications:

- PDF format
- Text-searchable
- Contain at least 50 words

If the wrong file was uploaded, click the "X" icon to delete the file and browse for a new one. When ready, click the **Save** button to attach the file as part of the draft Form ADV filing.

	<section-header> Drag and drop files here or</section-header>	browse	
TEST CRS UPLOAD.pdf Total (1)		Success 5.80 MB × 5.80 MB	j
			Cancel

Additional Tips:

Files that are locked or password protected will inhibit the system's ability to search for text. <u>All security</u> on the PDF file must be removed in order to upload the PDF file.

Additionally, files that are scanned to PDF format may not contain searchable text, as scanners generally capture an image of a document. To ensure that the file is text-searchable, the scanner must have the Optical Character Recognition (OCR) turned on.

If a user has PDF editing software (more than a simple PDF reader), existing PDF documents can be made text searchable by enabling OCR within the document. Here are the steps:

- 1. Open the PDF document.
- 2. Select "Tools" from the main menu.
- 3. In the Tools menu, click "Recognize Text" and "In This File".
- 4. In the Recognize Text window, click "OK"

The text recognition process will proceed. Please note that for a very long document, the process may take several minutes to complete. When all the pages are processed, search for a common word in the document to verify that the document now is text-searchable and then save it.

Part 3 Relationship Summary (Continued)

To Edit or Delete a Form CRS saved as part of a pending ADV filing, click the applicable icon in the **Action(s)** column.

Tip: Clicking the PDF icon in the CRS column will display a read-only version of the uploaded file.

Protect Personal Inform esponding to more genera uidance provided on the F	ersonal Information! Remember to only provide personal information about individuals in response to specific questions that solicit that information. When to more general questions that accept narrative responses, use terms that do not disclose personal information (including account numbers). Please review the rovided on the Protecting Personal Information in Form ADV Filings page for more information.				
CRS	Type(s)	Affiliate Info	Retire	Action(s)	
ß	Dual	~	\longrightarrow	C to	
Jpload CRS					

Form CRS uploads are submitted to IARD as part of the overall Form ADV submission process. Users must pass the **Completeness Check** and click **Submit Filing** in order for their uploaded Form CRS to be officially submitted.

ADV on-line completeness checks passed successfully.
There are no Accounting Charges for this Filing.
Submit Filing

Retire a Relationship Summary

Firms that have successfully submitted Form CRS, but are no longer required to have a current Form CRS, can explicitly retire their current relationship summary via a Form ADV Amendment (using the same navigation steps on pages 2 and 3). When viewing the Form CRS history, select the "Retire" icon in the **Action(s)** column.

Protect Personal Inform responding to more genera guidance provided on the P	ation! Remember to only provide personal information about individuals in response to specific questions that solicit that information. When I questions that accept narrative responses, use terms that do not disclose personal information (including account numbers). Please review the Protecting Personal Information in Form ADV Filings page for more information.			
CRS	Type(s)	Affiliate Info	Retire	Action(s)
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Upload CRS				

Click the acknowledgement checkbox and select the **Save** button.

By se no lo	electing this box, the firm acknowledges that a CRS is no longer required; any CRS with a status of "Current" will be set to "Retired". These filings wi Inger be displayed publicly.
R	elationship Summary Type *
	O Investment Adviser (Submit a Relationship Summary as an investment adviser discussing your advisory services.)
	Dual Registrant (Submit a Relationship Summary as a Dual Registrant as defined in the Form CRS (Relationship Summary) instructions.)
	I am submitting (2) separate Relationship Summaries in a single PDF, one discussing my advisory services and one discussing my brokerage services.
	🔘 I am submitting (1) combined Relationship Summary in a single PDF, discussing both my advisory and brokerage services.
A	ffiliate Information *
	I am submitting a combined Relationship Summary discussing my firm's services and the services provided by an <u>affiliate</u> . I understand tha my <u>affiliate</u> has a separate submission obligation.
	Affiliate information is not applicable to my Relationship Summary submission.
	Cancel

Retire a Relationship Summary (continued)

After saving, a checkmark will appear in the Retire column. The Form CRS will be officially retired after the pending Form ADV filing is successfully submitted.

Protect Personal Inform responding to more genera guidance provided on the P	ation! Remember to only provide I questions that accept narrative r rotecting Personal Information in	personal information about individuals in r esponses, use terms that do not disclose p Form ADV Filings page for more informatio	esponse to specific questions ersonal information (includin n.	; that solicit that information. When g account numbers). Please review the
CRS	Type(s)	Affiliate Info	Retire	Action(s)
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Upload CRS				

Tip: If a current Form CRS needs to be replaced with a new one, uploading a new Form CRS will automatically retire the previously submitted Form CRS uploads. Firms are able to have only one current Form CRS at a time.

In the auto-retire scenario, an additional row will be added for the new current Form CRS and the previous Form CRS will be retired when the ADV filing is submitted. Please note that a retire checkbox will <u>not</u> appear in this specific scenario.

CRS	Type(s)	Affiliate Info	Retire	Action(s)
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<u>ل</u>	Dual	~		

Relationship Summary History

To review the firm's Investment Adviser and Dual BD/IA Form CRS submission history, select **Relationship Summary** in the Organization column on IARD Main.

CRD Main	IARD Main	Forms	Organization	Reports						
Site Map	Site Map User Info									
IARD Main				Forms	Organization					
User Info			ADV		View Organization					
FAQ - IARD.COM			New/Draf	't Filing	Brochure Search					
FAQ - NASAA.ORG			Generate Number	a Private Fund Identification	Identifying Information					
FAQ - SEC.GOV			Historical	Filing	Registration/Reporting Status					
Release Notes					Notice Filing Status					
			ADV-W							
IA Setting and Standard Fees			New Filin	g	Brochure Status					
Recommended Browsers			Pending F	iling	Relationship Summary					
Send Comments			Historical	Filing	Answers to Questions					
			ADV-E		Form of Organization Business Information Regulatory Assets Under Management					
			New Filin Historical	g Filing						

The firm's Form CRS history will display in descending chronological order, with the current relationship Summary listed first. Clicking each of the hyperlinked Filing IDs will display a read-only version of the uploaded file.

Organ		F: 000000	Prim	Primary Business Name: SAMPLE DUAL FIRM				
Organization SEC Number: 801-00000				Full Legal Name: SAMPLE DUAL FIRM				
View	BD Record		Elect	Electronic Filer				
	Filing ID	Filing Date	Type(s)	Affiliate Info	Status	Status Date		
	<u>1374250</u>	Feb 18, 2020	Dual	~	Current	Feb 18, 2020		
	<u>1374249</u>	Feb 13, 2020	Dual	~	Retired	Feb 18, 2020		