

Firm Element Program Checklist

This checklist outlines key items that FINRA-member firms should consider when executing their Firm Element continuing education program to ensure compliance with [FINRA Rule 1240](#) (SRO rules) and effective training for covered persons.

Needs Analysis

- Conduct an annual needs analysis to identify training requirements.
- Assess regulatory changes, firm policies, and business activities.
- Evaluate employee roles, responsibilities, and product offerings.
- Document the [needs analysis](#) process and outcomes.

Training Plan Development

- Develop a written training plan based on the needs analysis.
- Specify training objectives, content, and delivery methods.
- Include topics such as securities regulations, firm policies, and ethical standards.
- Tailor content to specific job functions of covered persons.
- Ensure training addresses new products, services, or regulatory updates.
- Consideration of other training courses required, to mitigate duplication

Content Requirements

- Consider annual regulatory priorities and/or [hot topics](#).
- Incorporate firm-specific policies and procedures.
- Address emerging risks and/or recent regulatory findings.

Delivery and Implementation

- Select appropriate training formats (e.g., in-person, e-learning, webinars).
- Ensure training is accessible to all covered persons.
- Schedule training sessions to meet annual completion requirements.

Recordkeeping

- Maintain records of training completion for each covered person.
- Document training content, dates, and attendance.
- Retain FE records per firm and SRO requirements.
- Ensure at least two years of Firm Element records are readily available for audits.

Monitoring and Evaluation

- Assess training effectiveness through course quizzes, feedback, or surveys.
- Monitor completion rates to ensure all covered persons participate.
- Consider updates to the training plan based on feedback or new needs.
- Review program compliance during annual testing and/or internal audits.
- Consider incorporating significant topics into branch audit programing