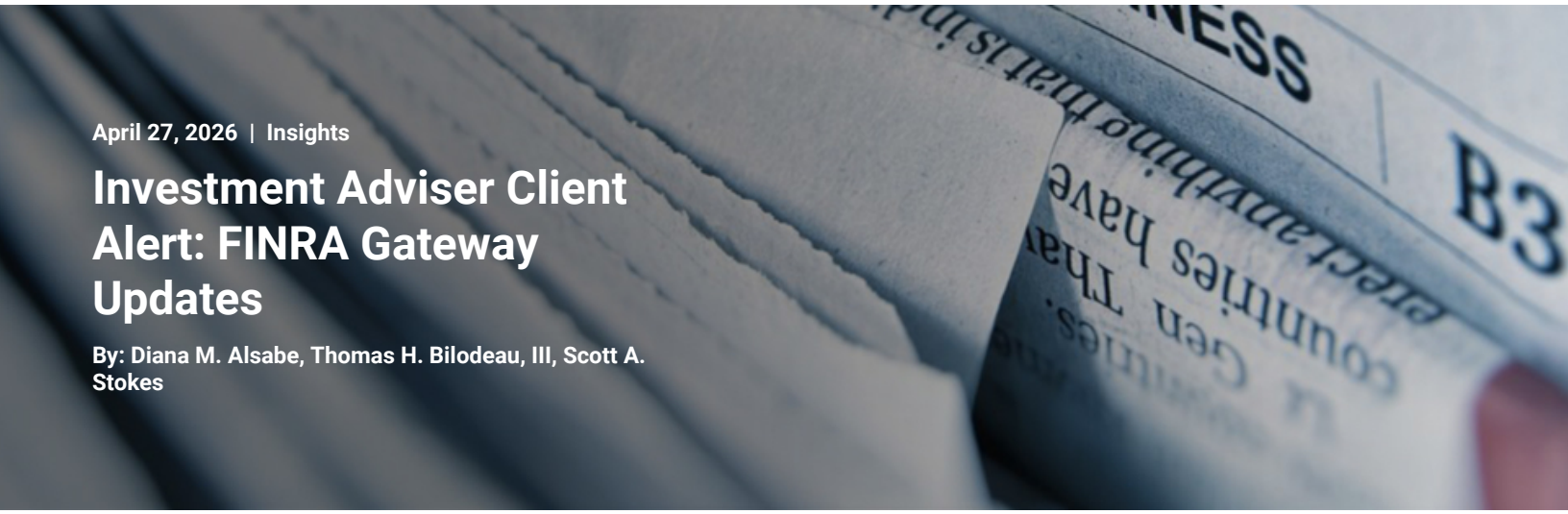


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Investment Adviser Client Alert: FINRA Gateway Updates

By: Diana M. Alsabe, Thomas H. Bilodeau, III, Scott A. Stokes

FINRA has announced that, effective May 11, 2026, certain users accessing FINRA systems through the FINRA Entitlement Platform will be required to complete identity verification using ID.me. This new requirement is part of FINRA's ongoing efforts to protect highly sensitive data and mitigate increasing cybersecurity and fraud risks. This new requirement can affect filers of Form ADV.

The initial rollout will apply to Super Account Administrators (SAAs), Account Administrators (AAs), and users with entitlements that permit access to Social Security numbers. As of mid-March, FINRA has begun communicating directly with affected users, with reminder notices to be circulated in April and May. Beginning May 11, in-scope users will be prompted on a rolling basis to verify their identity, with weekly rollout waves continuing through September 14, 2026.

When logging into the FINRA Entitlement Platform, affected users will receive an on-screen prompt directing them to ID.me. Successful verification will be required to access FINRA systems.

FINRA recommends that firms review entitlements in advance, remove unnecessary access, and ensure service provider accounts are assigned to specific individuals. Specifically, FINRA recommends all users with entitlements to work with their SAA to review accounts with access to CRD and IARD Social Security number entitlements and removing that access to the extent it is no longer needed by a certain user, to eliminate that user's verification requirement.

Provided the upcoming effective date of this change, we encourage you to act promptly, especially if you plan to remove entitlements before the rollout begins. We advise that, when contacted, you work with FINRA to ensure that your account is accessible after the rollout is complete, as access to the FINRA Gateway platform is crucial for submitting annual Form ADV filings.

Additional details about the rollout of this new program are available on the FINRA



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Website. If you have questions about the changes to the FINRA Gateway platform, please contact Scott Stokes, Thomas Bilodeau or Diana Alsabe at Rich May, P.C.

Disclaimer: This summary is provided for educational and informational purposes only and is not legal advice. Any specific questions about these topics should be directed to attorney(s) Scott Stokes, Thomas Bilodeau and/or Diana Alsabe.

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