

<b>CSCP™ Competency Statements</b>		<b>RE</b>	<b>AP</b>	<b>AN</b>	<b>T O T A L</b>
<b>Domains, Subdomains, and Tasks</b>					
<b>Domain 1</b>	<b>Compliance Policies and Procedures</b>	<b>4</b>	<b>4</b>	<b>2</b>	<b>10</b>
<b>Subdomain A</b>	<b>Policy and Procedure Development</b>				
1	Assist in developing a compliance program to ensure adherence to internal company policies, procedures, and processes and external laws, rules, and regulations.				
2	Assist in translating compliance requirements into written policies, procedures, and controls.				
<b>Subdomain B</b>	<b>Policy and Procedure Monitoring and Maintenance</b>				
1	Monitor the regulatory environment for new rules and regulations.				
2	Implement and update the firm's compliance program.				
3	Monitor for compliance with the firm's policies, procedures, and all applicable regulations.				
<b>Domain 2</b>	<b>Compliance Program Management</b>	<b>3</b>	<b>8</b>	<b>5</b>	<b>16</b>
1	Conduct ongoing program reviews to ensure compliance program is achieving its intended objectives.				
2	Assist in developing compliance management systems and operational procedures.				
3	Assist in developing and managing firm's compliance calendar.				
4	Assist in developing exception reports.				
5	Assist in responding to regulatory inquiries and oversee regulatory examinations.				
6	Evaluate and test new software that supports compliance activities.				
7	Meet with departments across the firm on compliance-related matters.				
8	Meet with supervisory personnel on compliance-related matters.				
9	Oversee registration / licensure of the firm and its personnel.				
10	Review internal controls.				
11	Participate in development and implementation of the annual compliance plan.				
<b>Domain 3</b>	<b>Monitoring and Surveillance Systems</b>	<b>10</b>	<b>23</b>	<b>14</b>	<b>47</b>
<b>Subdomain A</b>	<b>Exception Reports</b>				
1	Review exception reports.				
2	Investigate irregular activities and make recommendations as to the resolution/correction.				
3	Monitor conformance to firm's compliance program.				
<b>Subdomain B</b>	<b>Portfolio Management / Sales Practices</b>				
1	Assist in creation of standard investment management to ensure all information needed is collected to satisfy securities regulation requirements.				
2	Confirm that activity in client portfolios is consistent with client investment				

	guidelines and client-directed trade allocations.				
3	Confirm that client information and source of funds is properly documented.				
4	Review trading activity/customer accounts to assess suitability concerns.				
5	Review newly opened/closed accounts to verify conformance with the firm's policies, procedures, and applicable regulations.				
<b>Subdomain C</b>	<b>Trading Practices</b>				
1	Confirm that trading practices are consistent with the firm's policies.				
2	Confirm trading practices are consistent with best execution obligations.				
3	Identify and evaluate possible conflicts of interest.				
4	Review high risk trades.				
5	Review trades for adherence to trading limits and risk limits.				
6	Review trader's hedging activities.				
7	Review inventory for compliance with firm's aged inventory policy.				
8	Review transaction to ensure that only approved products are being sold / bought.				
9	Review mark-up on transactions.				
<b>Subdomain D</b>	<b>Trade Allocations</b>				
1	Evaluate proper allocation of investment opportunities among clients.				
2	Conduct review of "block trades/bunching" trading allocation to confirm that shares were properly allocated among clients.				
<b>Subdomain E</b>	<b>Code of Ethics Oversight</b>				
1	Ensure that required staff has disclosed all.				
2	Conduct pre-clearance for personal trading activities, where required.				
3	Monitor personal trading for adherence to internal policies and external regulations.				
4	Monitor personal trading activities for evidence of market timing and insider trading or appearance of conflict.				
5	Review outside business activities according to firm's policy.				
6	Review gifts and gratuities – given and received.				
<b>Subdomain F</b>	<b>Advertising, Marketing, and Corporate Communications</b>				
1	Review, track, and maintain records related to advertising, sales literature, and other company documents for regulatory compliance.				
2	Review written correspondence for regulatory compliance and required principal approvals.				
3	Conduct surveillance of electronic correspondence; review for red flags; conduct management follow-up.				
4	Review disclosures to determine that materials are in compliance with relevant regulations and any identifiable standards.				
5	Monitor advertising and marketing disclosures for accuracy of performance and attribution claims.				
6	Review new advertising against regulations requiring filing with FINRA.				

7	Review and monitor non-cash compensation arrangements.				
8	Review referral fee arrangements.				
<b>Subdomain G</b>	<b>Audits and Inspections</b>				
1	Conduct internal department compliance audits.				
2	Conduct branch office inspections.				
3	Conduct AML audits.				
4	Participate in liaising between firm/staff and external regulatory auditors.				
5	Prepare written report of all audits and inspections.				
6	Document recommendations or areas needing remediation.				
7	Track and monitor items needing remediation to resolution.				
<b>Subdomain H</b>	<b>Customer Complaints</b>				
1	Track incoming, in-progress, and resolved customer complaints.				
2	Investigate customer allegations and inquiries and respond where appropriate.				
3	Correspond with the client and/or firm's legal counsel regarding resolution of a complaint.				
4	Ensure all complaints are reported accurately and timely under NASD 3070 and/or Form U-4/U-5.				
5	Evaluate potential risk to the firm associated with customer complaint in accordance with applicable regulations and guidelines.				
6	Document resolution of client complaints.				
<b>Domain 4</b>	<b>Recordkeeping</b>	<b>9</b>	<b>2</b>	<b>2</b>	<b>13</b>
1	Monitor to ensure accurate creation and retention of required records.				
2	Review required records, including electronic records.				
3	Document advertising/marketing reviews.				
4	Document exception report review and resolution.				
5	Maintain records of branch audits or other inspections, including recommendations, follow-up, and management responses.				
<b>Domain 5</b>	<b>Enforcement</b>	<b>2</b>	<b>4</b>	<b>4</b>	<b>10</b>
1	Identify appropriate disciplinary standard.				
2	Make recommendation on course of action within scope of authority.				
3	When necessary, recommend action of an informative, corrective, or disciplinary action.				
4	Conduct follow-up evaluation after corrective or disciplinary action.				
5	Maintain records of all disciplinary actions and steps taken.				
<b>Domain 6</b>	<b>Training</b>	<b>3</b>	<b>2</b>	<b>1</b>	<b>6</b>
<b>Subdomain A</b>	<b>Compliance Education</b>				
1	Monitor applicable Notices to Member/Information Memorandum/Regulatory Actions and communicate information to appropriate employees.				
2	Implement firm's compliance education and training programs.				
3	Educate departments across the company to assist them in their understanding of regulatory and legal obligations.				

4	Prepare updates for field staff, educating and informing appropriate personnel of regulatory updates and changes in internal policies and procedures.				
5	Answer questions from personnel on compliance policies, procedures and regulations.				
6	Maintain the compliance program resources database.				
<b>Subdomain B</b>	<b>Continuing Education</b>				
1	Monitor compliance with continuing education requirements for regulations and as determined by the firm.				
2	Conduct annual firm element needs analysis.				
3	Develop, implement, and track firm's element continuing education plan.				
4	Escalate issues related to non-compliance with firm's continuing education plan.				
5	Obtain outside provider or develop company-sponsored continuing education program for appropriate personnel.				
<b>Domain 7</b>	<b>Reporting</b>	<b>4</b>	<b>6</b>	<b>1</b>	<b>11</b>
1	Prepare reports and filings for regulatory agencies.				
2	Prepare and file required regulatory reports outlining actions taken in resolution of customer complaints.				
3	Prepare and file required reports on trading activity of supervised staff.				
4	Prepare reports for Board and/or Ethics and/or Audit Committee.				
5	Prepare incident logs.				
6	Assist in preparation of annual report on compliance program.				
7	Compile and analyze data for compliance reviews.				
<b>Domain 8</b>	<b>Privacy and Confidentiality</b>	<b>2</b>	<b>2</b>	<b>0</b>	<b>4</b>
1	Assist management in developing, documenting, and implementing a privacy policy.				
2	Advise on adopting appropriate technology, policies, and procedures to ensure data security.				
3	Monitor secure treatment of client records and information.				
4	Monitor firm's maintenance of client records to ensure they are secure from unauthorized alteration or use.				
<b>Domain 9</b>	<b>USA PATRIOT and Bank Secrecy Acts</b>	<b>3</b>	<b>2</b>	<b>4</b>	<b>9</b>
1	Develop and maintain the firm's Anti-Money Laundering Program, including policies and procedures.				
2	Monitor for red flags related to money laundering or suspicious activities; prepare and file Suspicious Activity Reports.				
3	Screen new and current customers against the OFAC and SDN lists.				
4	Respond to requests for information from FinCEN under USA PATRIOT Act Section 314a.				
5	Review requests for information sharing from other financial institutions.				
6	Review transactions as part of monitoring the firm's Customer Identification				

	Program.				
7	Ensure that any foreign bank account has executed a certification.				
8	Conduct testing to ensure that Currency Transaction Reports (CTR, CMIR, FBAR) were filed in accordance with the regulations.				
9	Develop and conduct training under the guidance of the AML Compliance Officer.				
<b>Domain 10</b>	<b>Risk Management</b>	<b>0</b>	<b>6</b>	<b>3</b>	<b>9</b>
1	Identify different types of risks impacting the firm.				
2	Identify and mitigate conflicts of interest.				
3	Assess the potential impact of risks.				
4	Assist in development of appropriate risk management systems and operational procedures.				
5	Conduct risk-based focused audits.				
6	Conduct internal reviews of problematic activities.				
<b>Total Examination Items</b>		<b>40</b>	<b>59</b>	<b>36</b>	<b>135</b>