# memo

**To:** **IAR CE Stakeholders**

**From:** **NASAA Regulatory Systems and Services Department**

**Date:** **September 14, 2026**

**Re:** **IAR CE End of Year Processing**

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This memo addresses the 2026 end of year IAR CE processing procedure and associated important dates. If you have any additional inquiries, please contact the IAR CE team at IARCE@nasaa.org

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

FinPro notifications were sent to IARs who have a FinPro account and an outstanding IAR CE requirement on August 31st. Three additional email notifications will be sent to individuals on September 30th, November 30th and December 15th.

**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 created a FinPro account. 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, FINRA, on behalf of NASAA, will be emailing firms on October 15, November 19, and December 17 notifying them of their IARs who 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 Form ADV. Additionally, firms can use the IAR CE template report in Gateway to generate the report and IA firms can generate their own reports at any time using IARD.

**When is the last day to submit course completion rosters for guaranteed 2026 processing?**

The CRD system will stop processing rosters for 2026 renewals on **December 27th at 4:00 PM** Eastern Time (CRD System Shutdown). All course rosters submitted before the deadline will be processed and included in the 2026 renewal process. Rosters submitted after the deadline will continue to be processed but will not be considered as part of the 2026 renewal process. This impacts IARs who are deficient two years (e.g. 2025 and 2026) and are in a *CE Inactive* CE status at the time of the CRD System Shutdown (December 27 at 4:00 PM ET). IARs with a CE Inactive status at 4:00 PM on December 27 will immediately fail to renew (FTR) in IAR CE states.

**What if a roster is submitted between December 27 after 4:00 PM and December 31?**

Course rosters submitted after 4:00 PM on December 27 will continue to be accepted by the system and *CE statuses* will continue to update based on course completions after the CRD Shutdown. However, *registration* statuses for individuals who are CE Inactive at 4:00 PM on December 27 will immediately advance to IAR CE Fail to Renew (IAR_FTR). If an individual fails to renew due to deficient CE on December 27 their registration status will not update and will remain IAR_FTR until the CE deficiency is cleared and a new Form U4 is filed to reregister with the state when the system reopens in January.

**If an IAR does not complete their CE by the CRD System Shutdown (December 27 at 4:00 PM), will their 2027 registration be impacted?**

It depends. If the IAR is caught up on their requirement with the exception of the 2026 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 1. Based on the model rule, this is still an approved registration status. Once the IAR catches up on CE and the courses are processed, their registration will automatically change back to *Approved*.

However, if the IAR is deficient two years (e.g. 2025 and 2026) and are in a *CE Inactive* CE status at the time of the CRD System Shutdown (December 27 at 4:00 PM ET), yes, their registration will fail to renew for 2027. Once the IAR catches up on CE and the courses are processed, the IAR can submit a new Form U4 on or after January 2, and apply for registration again.

**What is the difference between CE Status and Registration Status?**

An IAR CE status indicates the IAR's level of completion of their annual IAR CE requirement. An IAR's registration status indicates the IAR's individual state RA registration status which can vary by state.

**How can an IAR verify their IAR CE and registration statuses?**

An IAR can view their IAR CE status, review registration statuses, monitor course completions, and other helpful information through the Financial Professional Gateway (FinPro Gateway).

**If an IAR wants to take one of the courses hosted on NASAA Learning, what is the last day those courses will be available for inclusion in 2026 processing?**

NASAA courses completed by midnight on December 22 will be submitted for processing prior to the CRD System Shutdown (December 27 at 4:00 PM ET). Courses taken after December 22 will not be processed until January 4, 2027.

**Will NASAA's Application Management System (AMS) shut down at the end of the year?**

No, the AMS will remain open for IAR CE Providers to submit course applications. However, NASAA recommends that providers allow 30 days for application review and processing, therefore, any application submitted after November 30th cannot be guaranteed to be processed before the end of the year.

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