

# HPAG Compliance News

## January 2020



### **New Employee Documentation**

When a new employee is hired in your office, you are currently filling out the LPL forms to add a new advisor or NLA. In addition, please provide HighPoint with the New Covered Person Form (attached to email). This will allow us to obtain the required registration and certification details to meet our compliance obligations. Please send all new advisor/NLA documents to me going forward. I will notify LPL and ensure our HPAG files are updated with the new information.

Once we receive these forms, we will be sending the individual a link to the AdvisorAssist new employee questionnaire. These are secure links, so the information will be protected. The questionnaire and all required certifications are due no later than 10 days after the date of employment, per SEC rules and regulations. Failure of an employee to complete the forms or failure of an office to submit the New Covered Person Form prior to the date of employment will result in disciplinary action.

### **Code of Ethics Certifications**

The Advisors Act requires each individual to certify to certain information within 10 days of hiring and within 30 days of quarter end. The quarterly certifications are sent on the first day of the new quarter, so you have 30 days to complete them. We will send a couple reminders about certification due dates, but ultimately, you are responsible for ensuring your certifications are completed within the required time frame. Due to the importance of these certifications, HighPoint will be using the following escalation system for missed or late certifications:

1<sup>st</sup> offense: Letter of warning to employee

2<sup>nd</sup> offense: Letter of warning to branch

Additional offenses: Discipline determined by HighPoint, up to and including fines or termination

As you are aware, we are now using AdvisorAssist to facilitate the distribution and collection of required certifications. If you are not receiving those emails, you are responsible for adding @advisorassist.com to your allowed senders list. Instructions on how to do that are attached on the Quick Guide to Proofpoint. There will be no due date exceptions granted for failure to add the domain to the allowed senders list.

### **Historical Certifications and Statements**

We have identified some historical certifications that have not been completed, so we will be reaching out to obtain those required documents. You should not backdate the signatures on these certifications. Further instructions will be sent with specific requests for information.

Please be on the lookout for these communications. I recognize these certifications are not always at the top of your to-do list, but maintaining clean compliance files is a major factor in reducing our regulatory risk. We appreciate your partnership and are committed to providing you with the strong compliance program your business deserves.

Thank you for your business!

January 10, 2020