

# Form CRS Initial Delivery Frequently Asked Questions

The content of this FAQ does not constitute legal advice and firms should consult with their legal counsel as needed.

Who needs to file Form CRS?	Every SEC-registered broker-dealer and investment adviser, including dual registrants, that serves retail investors is required to file a Form CRS. If your Firm does not have any retail investors, you are not required to prepare or file one.
Who is a retail investor?	<p>A natural person, or the legal representative of such natural person, who seeks to receives services primarily for personal, family or household purposes. The definition does not distinguish based on net worth.</p> <p>Individuals with high net worth are retail investors for Form CRS purposes, while Organizations (e.g. hedge funds, private equity funds, venture capital funds, family offices) are not retail investors.</p>
When is the initial filing date?	June 30, 2020 is the deadline.
How to file it?	<p>Investment Advisors can file on IARD either as: (1) an other-than-annual amendment or (2) part of your initial application or annual updating amendment.</p> <p>Broker-dealers can file Form CRS on CRD.</p> <p>Dual registrants must file on both IARD and CRD.</p>
When is Form CRS initial delivery due to existing clients and customers?	You must deliver Form CRS to each of your existing clients and customers who are retail investors within 30 days after June 30, 2020.

<p>When does Form CRS delivery requirement for new and prospective clients take effect?</p>	<p>You must begin to deliver your relationship summary to new and prospective clients who are retail investors as of the date you are first required to file (June 30, 2020).</p> <p>For Advisors, Form CRS must be delivered to retail investors at the earliest of: (i) before or at the same time you enter into an investment advisory contract (written or oral) with that retail investors; and (ii) before or at the time you recommend an account type.</p> <p>For Broker-Dealers, Form CRS must be delivered to retail investors at the earliest of: (i) before or at the earliest of recommending an account type, securities transaction, or an investment strategy involving securities; (ii) placing an order for the investor, and (iii) opening a brokerage account for the investor.</p>
<p>When is Form CRS delivery due to existing clients if a SEC registration is pending (after June 30)?</p>	<p>You may deliver Form CRS relationship summary to existing retail investors clients within 30 days after the effective date of the order granting your SEC registration.</p>
<p>How is Form CRS delivered?</p>	<p>You must post the current version of the relationship summary prominently on your public website, if you have one, in a location and format that is easily accessible for retail investors.</p> <p>If the relationship summary is delivered in a paper format as part of a package of documents, you must ensure that the relationship summary is the first among any documents that deliver are delivered at that time.</p> <p>If the relationship summary is delivered electronically, it must be presented prominently in the electronic medium, for example, as a direct link or in the body of an email or message, and must be easily accessible for retail investors.</p> <p>If your firm already sends quarterly account statements/reports, you may include the relationship summary with the mailing of your June 2020 quarterly account statements/reports.</p>

<p>What are the ongoing obligations to update Form CRS and file amendments?</p>	<p>You must update your relationship summary and file it within 30 days whenever any information becomes materially inaccurate. The filing must include an exhibit highlighting changes, for example, marking the revised text or including a summary of material changes. The additional disclosure showing revised text or summarizing the material changes must be attached as an exhibit to the unmarked amended relationship summary.</p> <p>You must communicate any changes in the updated relationship summary to retail investors who are existing clients or customers within 60 days after the updates are required to be made and without charge.</p> <p>You can make the communication by delivering the amended relationship summary or by communicating the information through another disclosure that is delivered to the retail investor (i.e. quarterly reports or annual updating amendments).</p>
<p>Can I file a joint Form CRS with my Broker Dealer affiliate(s) or Investment Adviser affiliate(s)?</p>	<p>Yes, you may include multiple affiliates in a single combined relationship summary. A combined relationship summary covering multiple affiliates must still comply with the four-page limit without compromising the relationship summary’s accuracy, clarity, usability, and design. The affiliates covered need to include at least one BD and one IA.</p>
<p>Can I deliver a relationship summary in non-English language?</p>	<p>Yes, you may deliver a complete translation of the relationship summary in a foreign language so long as the firm also delivers a separate English relationship summary at the same time.</p> <p>The translated version: (i) should be a complete, fair, and accurate translation of the English relationship summary; (ii) should not make any of the terms used in the relationship summary misleading; and (iii) would not count towards the applicable page limit. Do not translate the term “U.S. Securities and Exchange Commission.”</p>
<p>Where can I find more information?</p>	<p>Form CRS Instructions: <a href="https://www.sec.gov/rules/final/2019/34-86032-appendix-b.pdf">https://www.sec.gov/rules/final/2019/34-86032-appendix-b.pdf</a>  Form CRS FAQs: <a href="https://www.sec.gov/investment/form-crs-faq">https://www.sec.gov/investment/form-crs-faq</a></p>