

NFA Notice to Members Re: FCM, FDM & IB Guaranteed Obligations & Self-Examination Questionnaire

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NFA Issues Notice to Members on Recent changes to Self-Examination Questionnaire

On June 2, the National Futures Association (NFA) issued Notice I-20-22 identifying recent rule amendments that are now reflected in NFA's Self-Examination Questionnaire. Among other minor changes, the questionnaire reflects recent amendments to the following:

- Interpretive Notice 9019 — Compliance Rule 2-9: Supervision of Branch Offices and Guaranteed introducing brokers (IBs) (effective January 1);
- Compliance Rules 2-29 and 2-36 and related Interpretive Notices regarding communications with the public and promotional material (effective January 1); and
- Compliance Rules 2-8 and 2-30 and Interpretive Notice 9029 — NFA Compliance Rule 2-10: The Allocation of Bunched Orders for Multiple Accounts (effective March 1).

NFA has also published Self-Examination Questionnaire Revision Notes, a comprehensive document specifying the recent changes to the Questionnaire.

Notice I-20-22 is available [here](#), and the Self-Examination Questionnaire Revision Notes is available [here](#).

NFA Issues Notice to Members Regarding Obligations Guaranteed by FCMs, FDMs and IBs

On June 2, the National Futures Association (NFA) issued Notice I-20-23 to advise member futures commission merchants (FCMs), forex dealers members (FDMs) and introducing brokers (IBs) that the Joint Audit Committee had recently issued Regulatory Alert #20-01 to remind these registrants of the appropriate net capital treatment of guaranteed obligations and liabilities of subsidiaries or affiliates. Pursuant to CFTC Regulation 1.17(f)(4), the full amount of any guaranteed obligation or

liability of a subsidiary or affiliate that is not reported through consolidation of the subsidiary or affiliate must be reflected in the computation of adjusted net capital.

Notice I-20-23 is available [here](#).

Regulatory Alert #20-01 is available [here](#).

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