

CORONAVIRUS INFORMATION & UPDATES

October 9, 2020

Expiration of COVID-19 Relief for APs and Principals to Submit Fingerprint Cards

On September 29, 2020, the U.S. Commodity Futures Trading Commission (“CFTC”) Division of Swap Dealer and Intermediary Oversight announced (available [here](#)) that it had declined to extend its April 2020 COVID-19 relief granted in Letter 20-16 and extended to September 30, 2020 in Letter 20-20 (available [here](#)) from the requirement that a fingerprint card be submitted to the NFA in connection with the listing of a principal or registration of an associated person (“AP”). As a result, effective October 1, all persons applying for AP registration or to be listed as a principal of a registrant must submit fingerprint cards to the NFA. Persons who have relied on Letter 20-20 must submit fingerprint cards to the NFA by November 2, 2020.

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Similarly, the NFA, on October 6, 2020, issued a Notice to Members (available [here](#)) confirming the expiration of relief that it had granted previously from the fingerprinting requirements in NFA Registration Rules 204(a)(2)(A) and 206(a)(1)(A).

Importantly, the NFA’s COVID-19 relief for members allowing APs to work from home without registering additional branch offices (as further discussed [here](#)) remains in effect for firms that continue to operate under their business continuity plans.

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Please contact [Deborah A. Monson](#), [Jeremy A. Liabo](#), [Lindsey Jones](#) or the Ropes & Gray attorney who usually advises you with any questions you may have or if you would like additional information.