Schulte Roth&Zabel Private Funds Regulatory UPDATE

NFA Updates Annual Questionnaire

October 2020

National Futures Association member commodity pool operators are required to update their "Annual Questionnaire" — an online template that aggregates various information about a member's business and operated commodity pools — on an annual basis (or upon the occurrence of certain events). On Oct. 2, 2020, the NFA announced a streamlined Annual Questionnaire¹ which, among other things:

- Consolidates multiple, member category-specific questionnaires into one master Annual Questionnaire;
- Adds dynamic question logic that removes irrelevant questions; and
- Improves integration with other NFA filing systems such as EasyFile and the Online Registration System.

A transcript and recording from a webinar on the updated Annual Questionnaire will be made available to acquaint compliance personnel with the new framework. NFA members should note that there will be no grandfathering in of the old format — all members who access the system on or after Oct. 2 (including those who have an in-progress update) will need to complete their changes using the new system.

This article appeared in the October 2020 edition of SRZ's Private Funds Regulatory Update. To read the full Update, click here.

¹ See NFA Notice I-20-33, available <u>here</u>.