REDAN COMPLIANCE · TRAINING ROLLOUT

Moving compliance training to a quarterly program

What changes, what it costs, and the one decision it asks of senior management. Written to be read in a few minutes and handed on.

THE ASK

Endorse the move from one annual session to a quarterly program, name one executive sponsor, and run the first quarter as a pilot — with a report back and a way to stop. That is the whole decision. It is not a budget request and not an open-ended commitment.

WHY NOW

Rule 206(4)-7 requires written policies reasonably designed to prevent violations, reviewed at least annually. It sets no curriculum and no hour count. But the Division of Examinations names compliance-program effectiveness among its adviser priorities, and when staff listed advisers that had not implemented their own policies, training was the first example. **A manual that commits the firm to training it does not deliver puts the violation on your own paper.**

WHAT CHANGES

The work spreads across the year instead of one long day. Everybody takes the firm-wide course and the code of ethics, each department adds what its work calls for, and a rule change or an incident brings a topic session. What each person takes is a composition chosen by role.

WHAT IT COSTS

People will spend more hours in training than they do today. That is the point, and better said out loud than found later. The first year also costs compliance more than the current annual session does — standing a program up is real work. That cost is one-time.

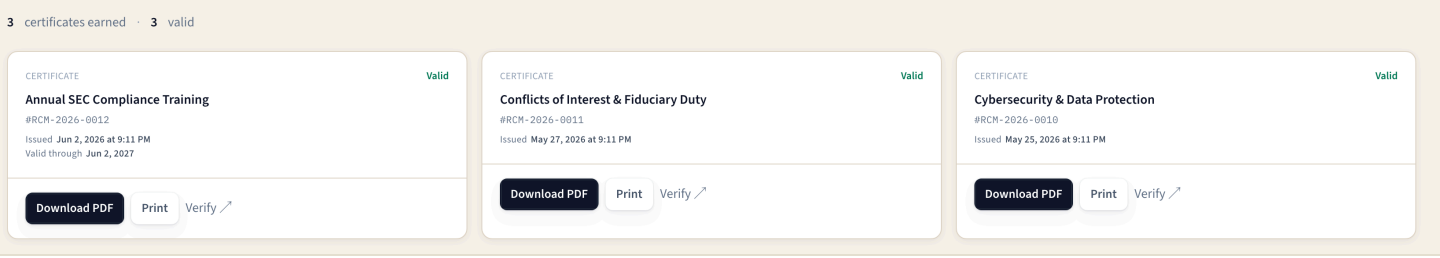
WHAT MANAGEMENT WILL SEE

A completion list per course showing who is outstanding, and per person the full record — every attempt, its score and a certificate, on any day you look.

Morgan Ellison	Annual SEC Compliance Training	IN PROGRESS 0% complete	0% —
Priya Nandakumar	New Hire Compliance Orientation (2026)	IN PROGRESS 0% complete	0% —
Hunter Alarcon	Annual SEC Compliance Training	COMPLETE Completed Jun 16, 2026	100% View certificate →
Hunter Alarcon	New Hire Compliance Orientation (2026)	COMPLETE Completed Jun 2, 2026	100% View certificate →

WHY IT NEEDS SENIOR MANAGEMENT

The endorsement is itself evidence. Examination staff have flagged advisers where senior management appeared to have limited interaction with the compliance function; an endorsement on the record answers that. Where a sign-in sheet says people attended, this says who trained, on what, when, and how they scored.



Sources: 17 CFR 275.206(4)-7(a),(b) · SEC Division of Examinations, FY2026 examination priorities · SEC Risk Alert, Nov. 19 2020, §II.B and §II.D — the views of OCIE staff, neither approved nor disapproved by the Commission. Educational illustration, not legal advice.