

# 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 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         | <div>IN PROGRESS</div> <div>0% complete</div>         | <div></div> 0%                                      |
| Priya Nandakumar | New Hire Compliance Orientation (2026) | <div>IN PROGRESS</div> <div>0% complete</div>         | <div></div> 0%                                      |
| Hunter Alarcon   | Annual SEC Compliance Training         | <div>COMPLETE</div> <div>Completed Jun 16, 2026</div> | <div></div> 100% <a href="#">View certificate →</a> |
| Hunter Alarcon   | New Hire Compliance Orientation (2026) | <div>COMPLETE</div> <div>Completed Jun 2, 2026</div>  | <div></div> 100% <a href="#">View certificate →</a> |

## 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.

3 certificates earned • 3 valid

CERTIFICATE

Annual SEC Compliance Training

#RCM-2026-0012

Issued Jun 2, 2026 at 9:11 PM

Valid through Jun 2, 2027

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CERTIFICATE

Conflicts of Interest & Fiduciary Duty

#RCM-2026-0011

Issued May 27, 2026 at 9:11 PM

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Cybersecurity & Data Protection

#RCM-2026-0010

Issued May 25, 2026 at 9:11 PM

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Hours and course counts reflect the Redan catalog. 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.