

Regulatory Update

US, November 2025

SEC 2026 Examination Priorities in Focus

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FINRA Annual Renewal Timeline and Action Steps and SEC Division of Examinations has published its 2026 Examination Priorities.

Reminder: Starting November 10, 2025, SEC-registered investment advisers must complete annual renewals of their state notice filings, as well as investment adviser representatives (IARs) and branch registrations, through the IARD Renewal Program.

Timely action is critical to avoid late fees and prevent disruptions in business operations. Below are the key dates and requirements for the upcoming renewal cycle.

Key Upcoming Compliance Dates

The renewal cycle includes several important milestones that firms should note to keep filings on track, including:

- **November 10, 2025:** Preliminary renewal statements become available for review.
- **December 8, 2025:** Deadline to fully fund your Renewal Account or Flex-Funding Account. Payments must be posted by this date to avoid late fees.
- **December 26, 2025:** Year-end filings must be submitted before system shutdown at 6:00 PM ET. This includes terminating any registrations you do not wish to renew for 2026 and finalizing any E-Bill renewal payments. Failure to pay by this date will result in automatic termination of registrations effective January 1, 2026.
- **January 2, 2026:** Final Statements become available in E-Bill. Preliminary Statements will be replaced in CRD/IARD.
- **January 23, 2026:** Deadline to report discrepancies or pay any remaining balance on the Final Statement. Firms must notify FINRA in writing of any discrepancies by this date. To ensure compliance, firms should review preliminary statements promptly, fund accounts on time, complete filings before the system shutdown, and save renewal reports for recordkeeping. After January 2, reconcile Final Statements and address any discrepancies before the January 23 deadline.

Actionable step: Review preliminary statements promptly, fund accounts on time, terminate unwanted registrations before year-end, and reconcile Final Statements immediately in January.

Read the full details here:

[Annual Renewal Program | FINRA.org](#)

[Renewal Payment Options.](#)

Regulatory Updates

SEC 2026 Examination Priorities Overview

On November 17, 2025, the SEC Division of Examinations published its 2026 Examination Priorities, continuing its risk-based approach to safeguard investors and maintain market integrity. These priorities serve as a roadmap for registrants, highlighting areas of heightened risk and encouraging proactive compliance measures.

Investment Advisers

The Division will maintain a strong focus on investment advisers, emphasizing fiduciary duty and loyalty obligations, particularly when serving retail investors. Examinations will closely review recommendations involving complex or high-cost products, advisers to private funds, and dual registrants. Newly registered advisers and those that have never been examined will also receive increased attention. Advisers that have recently merged or undergone structural changes will be prioritized to ensure compliance programs remain effective during transitions.

Examinations will also assess conflicts of interest related to compensation structures, account allocation practices, and account selection practices, with particular scrutiny on dual registrants where advisory and brokerage activities may create incentives that disadvantage clients. Reviews will evaluate whether dual registrants appropriately disclose and mitigate conflicts arising from recommending brokerage accounts over advisory accounts, or vice versa, based on compensation differences.

Specific Product Risks

Examinations will pay close attention to recommendations involving:

- Complex ETFs, such as leveraged, inverse, or option-based ETFs
- Alternative investments, including private credit and private funds with extended lock-up periods
- High-cost products with elevated commissions or expenses
- Crypto assets and structured products for suitability, disclosure practices, and risk management.

Compliance Programs

Compliance programs remain a core area of scrutiny. The SEC will assess the effectiveness of advisers' compliance frameworks, including marketing practices, valuation methodologies, custody arrangements, and annual reviews. Custody rule compliance will be a particular focus, especially for advisers managing alternative investments or private funds. Firms integrating new technologies, including artificial intelligence, must ensure policies and disclosures adequately address associated risks.

Investment Companies

Investment companies will be examined for fund fees, expense waivers, and portfolio management practices. A significant priority for 2026 is compliance with the updated Names Rule under the Investment Company Act, which requires accurate and transparent naming conventions. Funds employing complex or illiquid strategies will be subject to heightened review to ensure proper risk management and disclosure.

Broker-Dealers

Broker-dealers will see continued focus on financial responsibility rules, operational resiliency, and liquidity risk management. Trading practices, including extended hours and municipal securities, will be monitored closely.

Sales practices under Regulation Best Interest remain a key priority, particularly regarding rollover recommendations and advice provided to older investors. Reviews will include conflicts arising from compensation arrangements and recommendations influenced by economic incentives, with a focus on transparency and compliance.

Other Market Participants

The SEC will continue oversight of clearing agencies, municipal advisors, transfer agents, security-based swap dealers (SBSDs), security-based swap execution facilities (SBSEFs), and funding portals. Oversight will also include national securities exchanges and FINRA, focusing on governance, compliance programs, and operational resiliency.

Cross-Market Risk Areas

Across all market participants, the Division will prioritize cybersecurity and compliance with Regulation S-P and Regulation S-ID, reflecting the growing importance of data protection and identity safeguards. Emerging financial technologies, including artificial intelligence and digital platforms, will be examined for associated risks. Regulation Systems Compliance and Integrity (SCI) compliance will be emphasized to ensure systems integrity, alongside operational resiliency and vendor oversight.

2026 SEC and FINRA Compliance Priorities: Key Changes from 2025

Compared to last year's focus areas, the 2026 examination priorities highlight several notable shifts that firms should be aware of as they plan and refine their compliance programs, including:

- Compliance with the 2024 amendments to Regulation S-P is now a major focus
- Enhanced attention to the Names Rule under the Investment Company Act
- Broker-dealer oversight expands to include operational resiliency and liquidity risk management
- Technology-related priorities broaden to cover systems integrity under Regulation SCI
- Preparedness for the shortened settlement cycle (T+1), which featured prominently in 2025, is not listed for 2026
- Anti-Money Laundering, explicitly highlighted last year, does not appear as a standalone priority
- Private fund advisers remain a focus, with deeper examinations into interfund transfers, preferential treatment (including side letters), affiliated service providers, and fee and expense allocation practices.

Read the press release [here](#).

Practical 2026 Compliance Readiness Checklist

To translate regulatory priorities into day-to-day action, firms can use this checklist as a practical guide for strengthening compliance programs and preparing for upcoming examinations.

- ✓ Update compliance programs to ensure robust controls around marketing, valuation, custody, and annual reviews.
- ✓ Review cybersecurity protocols for alignment with Regulation S-P amendments, including vendor oversight and identity safeguards.
- ✓ Prepare for Names Rule compliance by auditing fund naming conventions and related disclosures.
- ✓ Evaluate operational resiliency plans, including Regulation SCI compliance and vendor oversight.

- ✓ Verify custody rule compliance, especially for alternative investments and private funds.
- ✓ Conduct gap analyses for private fund advisers, focusing on interfund transfers, preferential treatment (including side letters), affiliated service providers, and fee/expense allocation.
- ✓ Confirm Regulation Best Interest compliance for broker-dealers, including rollover recommendations and municipal securities disclosures.
- ✓ Review disclosures for complex ETFs, structured products, and alternative investments to ensure accuracy and transparency.

How Can Waystone Help

Waystone is a leading global provider of institutional governance, administration, risk, and compliance services to the asset management and financial services industry. Our global Compliance Solutions team helps clients navigate the US regulatory landscape with confidence, aligning investment strategies and operational processes with compliance requirements.

Waystone brings over 20 years of experience supporting investment advisers and funds regulated by the SEC, CFTC, and FINRA. Our US-based team delivers tailored, risk-focused, and cost-effective compliance solutions. With deep regulatory expertise, we help enhance your firm's governance framework while adding measurable value to your compliance program.

If you question about the topics covered in this article or want to learn how Waystone can help you meet SEC and FINRA expectations, please reach out to your usual Waystone representative or contact our [US Compliance Solutions](#) team below.

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This Regulatory Update provides information about the consultative documents and publications issued by various regulators which are still current, proposed changes to the Rules and Guidance set out in Handbooks, actual changes to Rules and Guidance that have occurred in the months leading up to the update and other matters of relevance to regulated firms. This Regulatory Update is intended to provide general summarized guidance only, and no action should be taken in reliance on it without specific reference to the regulators' document referred to therein.