

CLIENT ALERT

NFA Members must assign Member Questionnaire access

Designate a “Qualified Individual” before October 15, 2024.

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The National Futures Association this year adopted Compliance Rule 2-52 which mandates a new filing procedure for NFA's Member Questionnaire (the “Questionnaire”).¹ As of October 15, 2024, a member's Questionnaire may be submitted only by a person who is designated as a “Qualified Individual.” For most members, a Qualified Individual must be both an associated person and a principal of the member. If a member is a swap dealer only, any principal can be the Qualified Individual.

Via NFA's Online Registration System (“ORS”), each NFA member must assign “Enter and Submit” access to at least one Qualified Individual. Any Questionnaire due on or after October 15, 2024, will not be accepted unless submitted by a Qualified Individual. Current ORS users will continue to be able to enter information in a Questionnaire on behalf of a member.

¹ For an in-depth discussion of the requirements of Rule 2-52, please refer to our prior client alert, available [here](#).

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If you have any questions regarding this client alert, please contact one of the authors, any member of our CFTC team listed below, or the Willkie attorney with whom you regularly work.

Willkie has a dedicated team of attorneys with extensive knowledge and experience in all aspects of the Commodity Exchange Act and the CFTC regulatory regime. We would be pleased to assist on your matters.

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