

I am in favor of ongoing training using outside vendors or FINRA developed programs on a periodic basis that can be tailored to activities of the persons involved. A competency test could be included using the “e-learning” process of referring to the correct answers for educational purposes. These could be delivered as continuing education and initially incorporated in the firm element of the members. If this was found to be insufficient, regulatory element training could be substituted AFTER study of the achievement of publicly identified FINRA and SEC objectives.