

INTERNATIONAL TA/CA HARD CARD PROCESS INSTRUCTIONS

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Introduction

The Financial Industry Regulatory Authority (FINRA) has chosen Sterling as its FBI channeler for the Fingerprint Program for Transfer Agents and Clearing Agencies (TA/CAs). Due to FBI requirements, FBI channelers can only provide fingerprinting services within the U.S. and its territories.

Because of this requirement, any TA/CA that has candidate populations outside of the U.S. and its territories must use a U.S.-based affiliate or designate a U.S.-based agent ("U.S. Agent") to participate in the Program. The U.S. Agent must be domiciled in the U.S. and be authorized by the TA/CA to perform Program responsibilities on behalf of the TA/CA. Program responsibilities include placing fingerprint orders, receiving FBI results, and ensuring payment of Sterling invoices.

FBI prohibits electronic fingerprint collection outside the U.S. and its territories, and does not permit channelers from directly receiving fingerprints collected outside the U.S. For these reasons, fingerprints need to be captured on FINRA-specific fingerprint cards ("FINRA hard cards") that have been designed for the new Program and sent to FINRA in a designated international mailer ("International Mailer"). FINRA hard cards and International Mailers are available for purchase from Sterling.

Please make sure that you procure FINRA hard cards and International Mailer kits prior to your U.S. Agent placing orders in the Client Hub to ensure orders do not expire.

FINRA Hard Card Requirements and Purchasing Instructions

TA/CAs are required to use FINRA hard cards for the TA/CA program. Please note:

- To order FINRA hard cards, contact Sterling via email at TaoClientSupport@FADV.com or call 1-833-794-2009.
- FINRA hard cards are only available in packets of 25 cards. You can order as many packets as needed for your candidate volume.
- The cost for each FINRA hard card packet is \$10.00 plus actual shipping cost. Sterling will ship using a cost-effective carrier when possible.
- TA/CA will be invoiced monthly by Sterling for FINRA hard card purchases along with the amount due for fingerprinting services and FBI fees.

!! DO NOT USE !! Please do not use FD-258 forms, as these will be rejected and shredded.

International Mailer Requirements and Purchasing Instructions

In addition to the FINRA hard cards, TA/CAs will need to use the FINRA International Mailers for this Program.

- To order International Mailers, contact Sterling at: TaoClientSupport@FADV.com or 1-833-794-2009.
- International Mailers are only available in International Shipping Kits of 10 mailers. You can order as many kits as needed for your candidate volume.
- Cost for each International Shipping Kit (of 10 mailers) is \$45.00 plus actual shipping cost. Sterling will ship using a cost-effective carrier when possible.
- TA/CA will be invoiced monthly by Sterling for International Shipping Kit purchases along with the amount due for fingerprinting services and FBI fees.
- To ensure timely processing, the International Mailer must be used for mailing hard cards from outside the U.S. or its territories to FINRA.

Each International Mailer is composed of an inner envelope (with an address label from FINRA to Sterling), and an outer envelope, which fits the inner envelope. The inner envelope should hold no more than 200 FINRA hard cards.

International Hard Card Process

Please follow the instructions below to ensure your hard card submission complies with FBI and FINRA requirements.

FINRA Hard Card Fingerprint Capture

The TA/CA will facilitate fingerprint capture of the candidate (outside of the U.S. and its territories) on purchased FINRA hard cards:

- FINRA hard cards used for fingerprinting must be the original cardstock. Photocopies of the FINRA hard card will not be accepted.
- Fingerprints should be captured by trained technicians employed or contracted by the TA/CA.
 - Technicians must be familiar with FBI fingerprinting quality and privacy requirements.
 - Candidates are not allowed to capture their own fingerprints.
- FINRA hard cards must be completely filled out per these [Hard Card Instructions](#).
- Hard cards must not be folded, torn/repaired, smeared, or damaged.
- Only one hard card should be provided per order. If Sterling receives multiple hard cards for the same order, the most legible hard card will be selected for processing, and the rest will be destroyed per FBI requirements.

After the FINRA hard cards are completed with captured fingerprints and FBI/FINRA-mandated information, the TA/CA will contact their U.S. Agent to place orders in Client Hub. The TA/CA will also provide the candidates' personal and demographic data required for fingerprinting. See FINRA hard card instructions link above for more information.

APPLICANT		LEAVE BLANK		TYPE OR PRINT ALL INFORMATION IN BLACK		LEAVE BLANK	
SIGNATURE OF PERSON FINGERPRINTED <i>John Smith</i>		LAST NAME Smith		FIRST NAME John		MIDDLE NAME	
EMPLOYER AND ADDRESS Example Organization 1234 5th Ave, New York, NY, 10038 USA		ALICES AXA		OR I USEID009Z		DATE OF BIRTH Month Day Year 10 01 1975	
DATE 4/17/2019	SIGNATURE OF OFFICIAL TAKING FINGERPRINTS <i>David Jones</i>	CITIZENSHIP C72	SEX M	RACE 5' 02"	HEIGHT 185	WEIGHT BRO	HAIR BLK
YOUR NO. QCA		CHDC9109Z		LEAVE BLANK			
REASON FINGERPRINTED 15 USC 78q(f)(2) Securities Personnel		FBI NO. []		CLASS			
ORG ID # 0123456789		ARMED FORCES NO. MNU		REF.			
		SOCIAL SECURITY NO. 987-65-4321		INDIVIDUAL ORG NO.			

Figure 1: Sample TAO/CA FINRA hard card data entry

International Hard Card Order Placement in Client Hub

Once all the personal and demographic information is received for the individual, the U.S. Agent will place one FINRA hard card order per individual.

Hard card order placement can be referenced in the “Initiating a Request for Candidate Information” section in the [Sterling Client Hub Fingerprinting User Guide for TA/CAs](#).

1. Log into Client Hub with your U.S. Agent Username and Password.
2. In the left-hand menu, select Invite Candidate, and fill out the New Order Settings. Please ensure that you select Fingerprinting Hard Card for the Screening Package.
 - a. **Account:** This should be the account you are sending the invite from (if you have more than one Sterling account).
 - b. **Workflow:** This should be Consent Plus.
 - c. **Position:** Select the position of “hard card fingerprint” for the hard card package.
 - d. **Location of Employment:** Enter the location where the candidate will be employed.
 - e. **Projected Salary:** Select the appropriate salary range for the candidate.
3. Once the Order Settings page is complete, click **Next** to go to the Summary tab.
4. In the Summary tab, confirm that the order information is correct, and then enter the following information:
 - a. First Name & Last Name: This will be the Candidate’s First and Last Name.
 - b. Email: This will be your U.S. Agent email address.
5. Once the First Name, Last Name, and Email are entered, click **Send Invite**. You, as the U.S. Agent, will receive an invitation to complete the candidate information collection step at the email you input in step 4b.

For more details on the Candidate Information Collection, please reference the “Completing Required Forms” section in the [Sterling Client Hub Fingerprinting User Guide for TA/CAs](#).

Click on the invite link that you received at the email address you entered in step 4b, which will direct you to Sterling's Candidate Hub.

1. If this is the first invite you receive at this email, then you will need to create an account using that email address and a password of your choosing (it is recommended to turn Multi-Factor Authentication off). If this is not the first invite you send to this email address, then select "I am a returning user" under the "Create Account" button, and login with your credentials.
2. When you login to Candidate Hub, you will be prompted to select the location from which you are submitting this information. Select United States and the relevant state.
3. You will then need to review the FBI Individual Rights statement and Electronic Signature consent form and sign electronically using the **Candidate Name**.
4. After the rights & disclosures, you will be presented with the **My Information** tab, which you will complete with the **Candidate Information that you received from the TA/CA**.
 - a. Enter the **Candidate's Contact Info**, and then the **Candidate's Demographic Information**, but make sure to enter the **U.S. Agent's Address** in the "Address History" section.
 - b. You can select any date range for the "move-in date" section.
 - c. Once all the information is completed in the **My Information** tab, click **Next**.
5. You will be taken to the **Fingerprinting** tab, where you will be presented with text informing you that you will receive instructions in your email on how to collect hard card fingerprints. However, you can ignore these instructions since the candidate already had their fingerprints collected. Click on **Next**.
6. You will then be taken to the **Documents** tab. For the FBI fingerprinting search, no other documents are required. Click **Next** to go to the **Review** tab.
7. Finally, in the **Review** tab, confirm the information. Ensure that the candidate information is correct and that the address entered is the U.S. Agent's address. Once all the information is confirmed, click **Confirm** to submit the invite.
8. In the Client Hub, you will see that the order is in Pending status: the order will move to a Complete status when the Criminal History Record Information (CHRI) has been received from the FBI.

Shipping Hard Cards to FINRA Using the International Mailer

After the U.S. Agent completes the Client Hub order submission process, they will notify the TA/CA to ship the FINRA hard cards to FINRA. The TA/CA can ship up to 200 hard cards at the same time, but each hard card must have a corresponding order in the Client Hub prior to mailing to FINRA.

Prior to shipment, TA/CAs should verify that the hard cards are completed correctly per the instructions above, and that the fingerprint images are legible. If the FINRA hard cards are not completed correctly, or if the images are illegible, they will be rejected prior to scanning by the Sterling review team.

Fingerprint cards need to be sent to FINRA in the International Mailer available for purchase from Sterling.

Shipping Instructions for International Mailer

1. Take one inner/outer envelope mailer from the International Shipping Kit.
2. Remove inner envelope (with label) from outer envelope.
3. Place no more than 200 FINRA hard cards into the inner envelope and seal the inner envelope securely.
4. Place the inner envelope into the outer envelope and seal the outer envelope securely.

5. Ship the outer envelope (with inner envelope containing hard cards) to FINRA via First Class or Overnight/Courier Mail:

First Class Mail	Overnight/Courier Mail
FINRA, Document Services P.O. Box 9495 Gaithersburg, MD 20898-9495	FINRA, Document Services 9509 Key West Avenue, 3rd Floor Rockville, MD 20850 Please note: When sending Overnight/Courier Mail, please include the following phone number: (301) 590-6500.

!! PLEASE NOTE !! Do not send hard cards to Sterling directly. The shipment must be mailed to FINRA, which will then send to Sterling for processing.

Support

If you have any questions about these instructions, please contact Sterling Support via email at TaoClientSupport@FADV.com or call 1-833-794-2009.