

# Regulatory Alert

## Updated NFA Fingerprinting Process Effective October 1, 2026

The NFA is implementing a new fingerprinting process for individuals who are required to submit fingerprints in connection with registration as an Associated Person (“AP”), Principal, or other registration category requiring fingerprint submission.

As of October 1, 2026 (the “Effective Date”), fingerprints will need to be submitted through Fieldprint, NFA’s newly designated fingerprinting service provider. Fieldprint will electronically submit fingerprints to the FBI for processing and provide the results directly to the NFA.

Before any individual can complete fingerprinting through Fieldprint, the NFA Member firm (the “Firm”) must activate a one-time account with Business Information Group (“BIG”), Fieldprint’s affiliate, before individuals can schedule a fingerprinting appointment with Fieldprint. The NFA generally encourages Firms to complete account activation as soon as possible to ensure its completion prior to the Effective Date and notes the process should take around 10-20 minutes to complete and does not need to be completed in one sitting.

BIG provides step-by-step instructions within the system. Before beginning the process, Firms should have their NFA ID (excluding any leading zeros), address and contact information ready and (i) review and sign the BIG Service Agreement as part of the account activation process and (ii) elect either to cover the \$17.50 charge for each fingerprint fee for the individual or require the individual to pay for the service themselves (BIG only accepts payment via credit card). Firms holding active accounts with BIG do not need to complete the account activation process but must sign an amended agreement to establish the NFA schedule.

Once active, the Firm will receive a unique Fieldprint code, which US-based individuals will include with the Firm’s NFA ID when scheduling appointments. Non-US based individuals will use their Firm’s NFA ID and unique Fieldprint code to request a physical fingerprint card, instead of scheduling a fingerprinting appointment. Fieldprint will send the fingerprint cards by Fedex with instructions for completion and submission of the card(s) for processing.

For Form 8-Rs submitted before the Effective Date, individuals may continue to submit fingerprint cards directly to NFA or elect to use Fieldprint if the Firm has already completed account activation.

Optima recommends that all Firms complete the BIG/Fieldprint account activation process as soon as possible to avoid delays in future registration filings.

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