Using NetGovern Search in the Interest of FINRA Compliance

Environment

NetGovern Search 6.x

Synopsis

Part of complying with FINRA regulations is the ability survey internal communications (eg. email) and look for fraudulent behavior. NetGovern Search provides multiple case types, from eDiscovery to auditing purposes, which can you assist in this goal. This article will describe how to leverage that functionality in the interest of achieving compliance within your organization.

Solution

A common method used to meet the supervisory requirements imposed by FINRA is to perform a random sample of the email to/from investment agents.

1. Log in to NetGovern Search with an account that has access to audit cases (doc).
2. Create a new audit case to be used with random sampling (doc).
    a. On the **Locations & Users** tab, select the investment agents to be included in the survey.
3. Some organizations choose to also associate supplementary criteria when considering what messages to sample (doc).
    a. if you have wordlist, include it in the **Body Contains** field (one term per line)
    b. set a date range over which this sample should be focused using either the **Sent** or **Received** date range
4. Right-click the **Configuration** tab and select **Random Sampling** to reveal the sampling options.
    a. Set the percentage of the mail matching your criteria (above) which you'd like returned. Default is to pick 1% of this data.
    b. Press **Generate New Sample Now** to receive a new random sample, selected at this moment.
5. Once a sample of messages is generated they will appear in the **Results** tab.
    a. They are considered *unreviewed* and will remain visible while they are in this state. The act of opening & viewing a message is sufficient to consider it *reviewed* and to remove it from the list. Items which warrant further investigation can be forwarded back to the auditor's mailbox & form the the basis of separate eDiscovery case.

You can reuse the audit case above to continue supervising in an on-going basis. For example, if you know you will perform this action every week then..

   i. you can set the criteria to only sample data from the previous 7 days (using the **Relative Date** function in step 3b, above)
   ii. and have the software re-sample automatically every 7 days (using options in step 4, above)

Now every week you can log in to the case, receive a fresh sample, review them, and log out. Items not reviewed will remain on the list for next week.

Notes

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Is it well written?	Yes No
Is the content complete?	Yes No