



Assigning Primary Firms for Reps with Multiple Firm Associations





Over 80,000 registered reps are associated with more than one registered firm, and this number continues to rise as more independent retail RIA firms are formed every day. A challenge faced by many Discovery Data clients is how to manage these multiple firm associations within a data warehouse and/or CRM system. The options generally are the following:

1. Allow duplicate rep records and associate each record with one of the firms.
2. Have one rep record and do one of the following:
 - Associate that one rep record to all firms the rep is associated with.
 - Select one firm to associate the rep with.

Each of the above approaches has its own benefits and drawbacks.

Allowing duplicate rep records and associating each record with one of the firms does not provide a holistic view of a rep and causes confusion and increased work for CRM users, and more records means more data management work. In most cases the approach preferred by Discovery Data clients is to have one rep record and select the most appropriate firm with which to associate the rep. Although improving CRM functionality increasingly allows for one rep record to be associated with multiple firm records, for some Discovery Data clients this is a preferred approach because the firm is doing business with the rep through more than one firm or the rep is an important contact/decision maker at more than one firm.

To facilitate the automated selection of a primary firm association, Discovery Data created the data fields PrimaryFirmCRD, PrimaryRIAFirmCRD and PrimaryBDFirmCRD, and we populated these fields for every rep. What follows is the logic we use to select the firm we consider the rep's primary overall and the rep's primary RIA firm and primary BD firm.



More than half of multiple firm reps are associated with two affiliated firms with one BD and one RIA.

For those reps associated with separate BD and RIA firms that are affiliated, your decision of which to select is typically driven by which entity your firm does business with, or at least which entity through which you do business with the particular rep. For example, for an independent contractor retail advisor who is solely associated with the BD firm Raymond James Financial Services, Inc. and the RIA firm Raymond James Financial Services Advisors, Inc., most Discovery Data clients assign this rep to the independent BD sales team. Therefore, for these reps we have made the following assignments:

- PrimaryFirmCRD: 6694 (Raymond James Financial Services, Inc.)
- PrimaryRIAFirmCRD: 149018 (Raymond James Financial Services Advisors, Inc.)
- PrimaryBDFirmCRD: 6694 (Raymond James Financial Services, Inc.)

Selecting not only one primary firm, but a primary RIA firm and a primary BD firm, allows our clients to make a selection by channel, if that is preferred. For example, if your firm only does business in the RIA channel or you are making assignments to a sales team that only covers the RIA channel, you can utilize the PrimaryRIAFirmCRD field rather than the PrimaryFirmCRD field.

For those reps associated with a dually registered firm as both a BD and RIA rep, and at the same time associated with one or more RIA firms, the following are your alternatives.



The second most common relationship is reps associated with a corporate platform and at the same time associated with an independent RIA firm.

If, for example, a rep is associated with LPL Financial as a BD rep or as both a BD rep and RIA rep, and at the same time is associated with another RIA firm which is not affiliated with LPL, we have assigned primary firms depending on a number of variable factors. If a rep owns the RIA firm, we made that the primary firm and primary RIA firm, rather than selecting the corporate platform. The reason is the rep brands their business and thinks of him or herself as doing business as that RIA firm, not as an LPL rep. For example, it is “Smith Financial” that is on the business card, website and front door. Only in small print does it state “Securities offered through LPL Financial...” If this is your perspective and you wish to address the advisors the way the advisors view themselves, selecting the unaffiliated RIA firm is the best approach.

However, if a rep is not the owner of or an executive at the unaffiliated RIA firm, we have made the primary firm the corporate platform while leaving the primary RIA firm as the unaffiliated RIA firm. Discovery Data clients in most cases assign the rep in this scenario to its BD sales team.

In cases where a rep is associated with two or more RIA firms, where one is not a corporate platform, it gets tougher to decide which to select; however, there are a relatively small number of these cases. Here are some of the factors considered when selecting the rep’s primary firms:

1. Rep name in firm name (e.g. “Smith Financial”)
2. Rep role (e.g. rep is CEO of one firm and CCO of another)
3. Rep is owner of one firm and not the other(s)
4. If a rep’s position is the same or unknown at each firm we apply firm level criteria, such as:
 - Firm type (e.g. if one is retail RIA and the other is adviser to hedge fund, select retail RIA)
 - Highest AUM
 - Most clients
 - Firm with a website
5. If applying firm criteria does not present an obvious choice, then a random selection is made. This is only done in rare cases.



1. If a rep is not a BD rep then the PrimaryBDFirmCRD field is NULL.
2. If a rep is not an RIA rep then the PrimaryRIAFirmCRD field is NULL.
3. If a rep is associated with only one firm, then that firm CRD auto-populates the applicable fields. For example, if a rep is associated as both a BD rep and RIA rep with a dually BD-RIA firm, then that firm CRD auto-populates PrimaryFirmCRD, PrimaryRIAFirmCRD and PrimaryBDFirmCRD.
4. If a rep is associated with one BD firm, then that firm is PrimaryBDFirmCRD.
5. If a rep is associated with one RIA firm, then that firm is PrimaryRIAFirmCRD.
6. If BD and RIA firm(s) are affiliated and a rep is associated only with these firms, then the following applies:
 - If the BD firm's PrimaryBDType is Independent, Wirehouse, Traditional, Discounter, Boutique or Bank, then auto-tag the PrimaryFirmCRD as the BD.
 - If the BD firm's PrimaryBDType is Institutional or Insurance, then auto-tag the PrimaryFirmCRD as the RIA. If a rep is associated with multiple RIA firms, logic provided further on describes how the RIA firm will be selected.
 - If the BD firm has the BD type Fund Distributor or Annuity Distributor, whether it is PrimaryBDType or not, and a rep is not Owner or Executive of the RIA firm, then auto-tag the BD firm as PrimaryFirmCRD.
7. If a rep is associated with a BD firm with PrimaryBDType Independent and an unaffiliated RIA firm the rep is not Owner or Executive of, then auto-tag the PrimaryFirmCRD as the BD.
8. If a rep in the above scenario is not Owner or Executive of either entity, then PrimaryRIAFirmCRD is the unaffiliated RIA firm.
9. If a rep is associated with a BD with PrimaryBDType Insurance and also associated with an unaffiliated RIA firm, then auto-tag the unaffiliated RIA firm as PrimaryFirmCRD, even if a rep is also associated with another RIA firm that is affiliated with the BD firm.
10. If a rep is associated with one BD firm and one RIA firm and the PrimaryBDType is Institutional, then auto-tag the PrimaryFirmCRD as the RIA.
11. If a rep is associated with one BD firm and one RIA firm and the BD firm does not conduct retail business and the rep has a title category Portfolio Manager or Research at the RIA firm, then the PrimaryFirmCRD is the RIA.



12. If a rep is associated with multiple RIA firms, then make the selections in this priority order:
 - If rep's last name is in firm name (e.g. "Smith Financial").
 - If rep's last name is not in firm name, select firm where rep title category is Owner.
 - If rep is not Owner, select firm where rep title category is Executive.
 - If rep is not Owner or Executive, or the rep's position in the firms is the same or unknown, apply firm level criteria in this priority order:
 - Firm type: if one firm is retail RIA and the other is not, select retail RIA
 - Highest AUM
 - Most clients
 - Firm with a website
 - If applying firm criteria does not present an obvious choice, then a random selection is made.
13. If a rep is Owner of one firm and not any other, then that firm is auto-tagged PrimaryFirmCRD, whether BD or RIA and the BD and RIA types do not matter. If a rep is associated with a dually BD-RIA firm and also associated with an RIA firm that is an affiliate of the dually firm, then auto-tag the dually firm as all Primary (PrimaryBDFirmCRD, PrimaryRIAFirmCRD, PrimaryFirmCRD).
14. If a rep is associated with an RIA firm for which the rep is not Owner or Executive, and the rep is also associated with a BD firm with PrimaryBDType Independent, then make PrimaryFirmCRD the BD.
15. If a rep is associated with an RIA firm for which the rep is not Owner or Executive, and the rep is also associated with a BD firm with PrimaryBDType Independent, and also associated with the RIA side of the Independent BD (dually firm) or an RIA affiliate of the Independent BD (corporate RIA), then make PrimaryFirmCRD the BD and PrimaryRIAFirmCRD the corporate RIA (which may be the same entity). This logic is only applied if the rep is ONLY associated with these firms.
16. If a rep is associated with a dually registered BD-RIA firm that is PrimaryBDType Independent, and is also associated with unaffiliated RIA firm of any type, the unaffiliated RIA firm is PrimaryRIAFirmCRD.



17. If a rep is associated with a dually BD-RIA firm, but only on the RIA side while at the same time associated with a BD firm that is an affiliate of the dually firm, the PrimaryFirmCRD is the BD. For example, a rep is associated with UBS Financial Services Inc (8174) as an RIA Rep and with UBS Securities LLC (7654) as a BD Rep. The PrimaryFirmCRD is the BD CRD 7654.
18. If a rep is associated with multiple unaffiliated firms where none of the above triggers result in the selection of one firm over another (e.g. neither firm has a website or AUM or accounts) then if the rep has a title or title category from one firm and not the other(s), that firm is the primary. Otherwise, if applying firm criteria does not present an obvious choice, then a random selection is made.
19. If a rep is associated with one BD firm and one RIA firm and the BD has BD Type Fund Distributor and the RIA has RIA type Adviser to Investment Company, and the BD and RIA firms are affiliated, assign the PrimaryFirmCRD in this order:
 - Other logic stated earlier applies first. If none results in selection, then:
 - If a rep's title category is Wholesaler, the PrimaryFirmCRD is BD.
 - If a rep's title category is Sales/Marketing, the PrimaryFirmCRD is BD.
 - If a rep's title category is Portfolio Manager, the PrimaryFirmCRD is RIA.
 - If a rep's title category is Research, the PrimaryFirmCRD is RIA.
 - If assignment is not made by any of the above, the PrimaryFirmCRD is BD.
20. If a rep is associated with an unaffiliated industry Fund Distributor on the BD side, such as ALPS or Foreside, and is associated on the RIA side with a firm that is RIA type Adviser to Investment Company, the PrimaryFirmCRD is the RIA.



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