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Deadlines for 2026 IARD Renewal Program

by David Tang and Michael Schmieder

All SEC-registered investment advisers ("advisers") are required to annually renew their state notice filings and state representative and branch registrations through the IARD Renewal Program.[1] Despite the government shutdown, advisers must still meet IARD renewal deadlines.

Preliminary renewal statements will be made available on the IARD system on November 10, 2025. The deadline for paying preliminary statement renewal fees is December 8, 2025. Advisers are asked to submit payments by December 3, 2025 to allow enough time for payments to be processed. Sending only a partial payment may cause your firm to fail to renew.

Firms with sufficient money in their account to cover their total renewal fees owed will have funds transferred to their Renewal Account. Transfers will be conducted daily going forward until CRD/IARD shuts down for year-end processing at 6:00 p.m. EST on December 26, 2025.

Advisers that fail to pay their renewal fees by December 26, 2025, will not have their state notice filings renewed and therefore will not be eligible to conduct business as an investment adviser in those states as of January 1, 2026. If this should occur, advisers would need to contact each jurisdiction directly to determine the appropriate reinstatement procedures.

Final renewal statements will be posted on the FINRA Gateway on January 2, 2026. The final renewal statement will include any new charges that occurred after the preliminary renewal statement. The deadline to pay the final renewal statement fees is January 23, 2026.

Dorsey's investment adviser compliance services are available to assist investment advisers with IARD account administration, including the annual IARD renewal process.

Related People

- David Tang
- Michael Schmieder

Related Capabilities

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[1] Renewal Program | IARD