



Elderly Clients

Each IAR will receive a Diminished Capacity Checklist, which shall be addressed for any Client that is over the age of 70 (“Elderly Client”). All IARs must review the capacity of their Elderly Clients periodically and document its efforts appropriately.

These efforts should address the following:

1. Be aware of red flag issues for diminished capacity- how to handle it, how to document, how to escalate if they occur with an elder client immediately report them to Compliance
2. Documenting ANY cognitive decline when monitoring an Elderly Client quarterly in Redtail CRM to protect IAR and the Advisor from potential liability
3. Any client over 70 must be contacted annually to evaluate cognitive abilities. Recap conversation with written notes on Redtail CRM
4. Ask Elderly Client who they appoint as their ADVOCATE should there cognitive ability potentially decline in the future, their ADVOCATE should obtain authority to oversee the Elderly Client’s assets. In addition, determine if Elderly Client would want to obtain durable power of attorney for each spouse, and to update the Custodian appropriately
5. Obtain Elderly Client’s attorney and family members contact information.
6. Develop an organizational document listing the Elderly Client’s possessions, a back up document to forward an ADVOCATE the Elderly Client’s username and passwords, and to develop an Investment Policy Statement for the Advisor and its ADVOCATE to continually follow.

Should any of these items apply to your client, you should contact John Ohl or James Catacchio immediately.