CRM Audit-Preparedness Checklist

This checklist walks you through the 8-point test to run on your CRM before a state or SEC examiner's letter arrives. The auditor should never be the first person to test your firm for compliance — you should be.

THE 8-POINT AUDIT-PREPAREDNESS TEST

- ☐ Client Communications
  Are all of your client communications documented in your CRM? Every phone call, every meeting, every email, every text? Does the note include mandatory fields like the four D's: Date, Delivery method, Doer, and Description? Have you made this as easy and fool-proof as possible by integrating your systems to capture this information automatically after each interaction? If not, find out how to do this.
- ☐ Access Logs
  Are client notes locked down and un-editable once entered? If not, do you have the access logs so you can identify who touched the record, what was changed, and when it was altered?
- ☐ Annual Review Cadence
  Does your CRM track the last annual review meeting? Does it remind you or automatically launch a workflow when it's time for another? Are client cancellations / reschedules logged into the system?
- ☐ Data Retention
  Can you produce the historical records going back the SEC-mandated five years (or whatever timeframe your state requires)? Have they been pulled in from a prior CRM migration with the four D's intact? If not, what are your plans for pulling any archived records? Can you do it yourself or will you need help from your IT vendor?
- ☐ Clean Data
  Are you cleaning your data on a regular basis?
- ☐ Secure Data
  Is your CRM secure? Have you verified table-stakes standards like SOC 2 Type II certification with your vendor? Does the system mandate Multi-Factor Authentication (MFA) for all user logins? Do you enforce long passphrases (15+ characters) over predictable short passwords? Are employee credentials strictly managed in a central password vault that your firm controls?
- ☐ Workflows Tied to Written Supervisory Procedures (WSPs)
  Do you document your planning and advice-giving processes through structured, repeatable CRM workflows? Can you show auditors that these workflows enforce your firm's Written Supervisory Procedures (WSPs)—ensuring your team follows a consistent SOP rather than relying on inconsistent manual steps or unverified AI output?
- ☐ Human in the Loop
  Do you ensure that any facts or values produced by LLMs that are used in advice-giving are reviewed and verified by a human? Do you require source-citing from your AI to document this verification? Most importantly, does your CRM document that this happened in some way?

Want a second set of eyes on your CRM?

This checklist gives you a solid running start. But the auditor shouldn't be the first person to look at your CRM — I will be, gladly, before they do. Reach out and let's make sure you're ready.

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Let's Coellaborate →

Let's connect and create a custom solution that suits your firm.

This is not, by any means, an exhaustive list of steps to take to prepare for an audit, and it's not to be construed as compliance or legal advice. I'm not a lawyer or compliance expert. I'm a data nerd with a healthy fear of regulators and authority figures in general.