Consolidated Audit Trail

Customer and Account Information System (CAIS)

Full CAIS Technical Specification Updates

8/31/21

Specification Updates

- **Key Updates**
  - Removal of Customer Start/End Dates and End Reason
  - Modifications to Address Validations and Appendix E
  - Addition of Doing Business As field
  - New *accountType* values of ENTITYID and RELATIONSHIP
  - Updated length of *accountName* and *legalName* attributes
  - Updated Inconsistencies Feedback File Name structure to incorporate Submitter ID

- **Minor Updates**
  - Clarified guidance on use of SSN/ITIN/EIN vs. Foreign Identifiers for TID generation
  - Included guidance on acceptable *foreignTIDType* for Legal Entity vs. Natural Person CAT Customer types
  - Updated the Description of the ADVISER *customerType* value to reference the Securities Exchange Act of 1934 definition
  - Updated the *customerRecordID* field on the FDID Customer List to clearly indicate the *customerRecordID* is a reference to the unique customer record within the file
  - Updates to record and file validations and error codes

Removal of Customer Dates

➢ On July 27th, 2021, the CAT Operating Committee approved a change order to remove the *customerStartDate, customerEndDate,* and *customerEndReason* fields from the Full CAIS Specification.
  ➢ IMs have indicated they store this data at the account level rather than the customer level.

➢ Only **active** customers are subject to inconsistency checking and data refresh requirements.
  ➢ An **active** customer has at least one active association to an FDID with no *roleEndDate* set (or a *roleEndDate* set in the future)
  ➢ An **inactive** customer has no active associations to any FDIDs, and all *roleEndDates* are set in the past

➢ The ***replacedByTID*** field should still be used in the event that a customer's Input Identifier used to generate their TID has changed.

Address Validation Updates

➤ Appendix E has been updated to remove Region Code and Postal Code formats for all countries except **United States** and **Canada**.

➤ *regionCode*
  ➤ ISO 3166-2 standard format was previously required for all *regionCodes* in all countries, but is now only required for addresses in the **United States** and **Canada**.
  ➤ For US and Canada, *regionCode* will be required and must follow ISO 3166-2 format.
  ➤ For countries other than US and Canada, *regionCode* will be a **conditional** Text field with a maximum length of 40 characters. IMs are to report regions as captured in their systems for countries other than US and Canada

➤ *postalCode*
  ➤ The format of *postalCodes* in the US and Canada will be **required**.
    ➤ US postal codes must follow the format **99999**.
    ➤ Canadian postal codes must follow the format **A9A 9A9**.
  ➤ For countries other than the US and Canada, *postalCode* will be a **conditional** Text field with a maximum length of 15 characters. IMs are to report postal code as captured in their systems for countries other than US and Canada.

Addition of *doingBusinessAs* Field

➢ Some CAT customers, such as sole proprietorships, use an SSN as the tax identifier for their business.

➢ These CAT customers must be reported to CAIS using an SSN as the Input Identifier for TID generation.

➢ Since SSNs can only be used as Input Identifiers for **Natural Person** CAT customers, a field is being added to the Natural Person Customer schema to capture the **Doing Business As** name where applicable.

➢ The *doingBusinessAs* field will allow for up to 200 characters.

Other Notable File Schema Updates

➢ **New *accountType* values – ENTITYID and RELATIONSHIP**
  ➢ The ENTITYID *accountType* value can only be used if the FDID's *fdidType* is 'ENTITYID'.
  ➢ The RELATIONSHIP *accountType* value can only be used if the FDID's *fdidType* is 'RELATIONSHIP'.
  ➢ For ENTITYID and RELATIONSHIP FDIDs, firms can include additional *accountType* values as applicable, so long as the array includes the corresponding 'ENTITYID' or 'RELATIONSHIP' value matching the *fdidType*.

➢ ***branchOfficeCRD***
  ➢ Changed field to **conditional** – must be included if known to the Reporter firm.

➢ ***accountName*** and ***legalName***
  ➢ Maximum length updated to **200** characters.

FINRA CAT Helpdesk

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