
CAT CAIS – Transition from LTID to Full Customer & Account

10/13/2021

Full CAIS Agenda

- Customer and Account Reporting Overview
- Test Environment Plan Overview
- Transition Period
- Full CAIS Go-Live
- Feedback and Repairs
- Schema Changes
- CAIS Reporter Portal Functionality and Example Screens
- Full CAIS Resources

Industry Member Release Rollout

04/26/2021

CAIS LTID Mandatory Reporting

- CAIS LTID reporting required for Phases 2a, 2b, and 2c (Large Industry Members)
 - CAIS LTID Rejection Repair timeline enforced
- Large Industry Member Phase 2d reporting required on 12/13/2021
- Small Industry Members Phase 2a, 2b, 2c, and 2d reporting required on 12/13/2021

01/31/2022

Industry Test Release Full CAIS

- Full CAIS Reporter Portal Industry Test Open - Manual Submission and File Upload
- Industry Test Open for Machine-to-Machine File & Data Integrity Validations & Feedback
- Industry Test Open for Inconsistency Feedback & Repair
- Prod Mirror remains open for LTID Phase testing

02/01/2022

Full CAIS Certification Opens

- Full CAIS Self-Reporter Certification
- Full CAIS Submitter Certification
- Full CAIS Certification for an Industry Member only using Submitter(s)
- Required by 6/20/2022

04/25/2022

Full CAIS Production Opens

- **LTID Phase Reporting remains available**
- Full CAIS Reporter Portal Production Open - Manual Submission and File Upload
- Production Open for Machine-to-Machine File & Data Integrity Validations & Feedback
- Production Open for Inconsistency Feedback & Repair
- Full CAIS Reporter Statistics available

7/11/2022

Full CAIS Mandatory Reporting

- **LTID Phase Reporting deprecated**
- Full CAIS reporting required for all Phases
- Full CAIS Rejection Repair timeline enforced
- Full CAIS Inconsistency Repair timeline enforced

CAIS Reporting Overview

- The reporting of Customer Identifying Information and Customer Account Information consists of two phases:
 - LTID Account Phase: April 26, 2021 through July 10, 2022
 - Subject to the phasing requirements set forth in the plan
 - Full CAIS Phase: Starting on July 11, 2022
- In order to facilitate testing of Full CAIS data, the Full CAIS schema will be deployed into the Test, Production Mirror (“Prod-Mirror”) and Production Environments in phases:
 - Industry Test Release
 - Transition Period
 - Full CAIS Go-Live

CAIS Reporting Overview– Continued

- After the Full CAIS schema deployment in each environment:
 - CAT Reporters may submit data in either the LTID Account Phase (schema version 1.0.0) or Full CAIS Phase (schema version 2.0.0) until July 10, 2022
 - Industry Members still have an obligation to report FDIDs having LTID associations to the Production Environment until July 10, 2022
 - The Production Go-Live date for all Industry Members for Full CAIS reporting requirements is July 11, 2022
 - On and after July 11, 2022, CAT Reporters may only submit data to all environments in the Full CAIS Phase format (schema version 2.0.0)

Summary of Acceptable Schema in Each Environment

Code deployment begins at approximately 8 am ET January 30, 2022, April 24, 2022, and July 10, 2022

	January 30, 2022 – April 23, 2022	April 24, 2022 – July 9, 2022	July 10, 2022 and beyond
Environment	Acceptable Schema(s)	Acceptable Schemas	Acceptable Schema
Industry Test	Full CAIS Phase and LTID Account Phase	Full CAIS Phase and LTID Account Phase	Full CAIS Phase
Production Mirror	LTID Account Phase	Full CAIS Phase and LTID Account Phase	Full CAIS Phase
Production	LTID Account Phase	Full CAIS Phase and LTID Account Phase	Full CAIS Phase

Test Environment Plan Overview

- In order to facilitate testing of Full CAIS (Phase 2e) data, effective January 31, 2022, the Test Environment will accept submissions in both the LTID Account Phase schema (version 1.0.0) *and* the Full CAIS Phase schema (version 2.0.0 or higher) until July 10, 2022.
- Code deployment to the Test Environment will begin at approximately 8 am ET on January 30, 2022.
- Users currently properly entitled to the Test Environment for the LTID Account Phase will retain their entitlement.
- Reporting relationships currently established in the Test Environment for the LTID Account Phase will remain.

Transition Period (April 24–July 10, 2022)

- To facilitate the transition from LTID Account Phase (schema version 1.0.0) to Full CAIS Phase (schema version 2.0.0 or higher), CAT Reporters may begin reporting Full CAIS Phase submissions to the Production and Prod-Mirror Environments on April 24, 2022.
- Code deployment to the Production and Prod-Mirror Environments will begin at approximately 8 am ET on April 24, 2022.
 - Prior to code deployment, all submissions to the Production and Prod-Mirror Environments must be in schema version 1.0.0
- During the Transition Period between April 24, 2022 and July 10, 2022:
 - The Test Environment will accept submissions in both the LTID Account Phase schema (version 1.0.0) *and* the Full CAIS Phase schema (version 2.0.0 or higher).
 - The Production and Prod-Mirror Environments will accept submissions in both the LTID Account Phase schema (version 1.0.0) *and* the Full CAIS Phase schema (version 2.0.0 or higher), if the Industry Member has been certified for Full CAIS Production reporting.
- To ensure that Industry Members can submit the full suite of required data to the Production Environment by the Go-Live date of July 11, 2022, CAT Reporters are encouraged, but not required, to submit data to the Production Environment in Full CAIS format during the Transition Period.

Transition Period (April 24–July 10, 2022)– Other Notes

- Once a Firm Designated Identifier (FDID) record has been accepted into CAT CAIS in a Full CAIS Phase (v2.0.0) submission, attempting to submit the FDID again in an LTID Account Phase (v1.0.0) submission will result in a rejection of the record.
 - If the FDID has not been accepted in a Full CAIS Phase (v2.0.0) submission, FDID rejections received against a Full CAIS Phase submission may be repaired by submitting the FDID again in an LTID Account Phase (v1.0.0) submission.
- All active FDID records reported in the LTID Account Phase (v1.0.0) submission must be accepted in a Full CAIS Phase (v2.0.0) submission on or before July 11, 2022.
- Please note that unlike in the LTID Account Phase, CAT Reporters must submit the entire record rather than just the delta.

FDID Version Reporting

- To support the transition from LTID to Full CAIS reporting, an FDID Version Report containing the list of active FDIDs received in an LTID Account Phase submission and not yet accepted in a Full CAIS Phase submission in the Production Environment, will be made available within the CAT CAIS Reporter Portal UI in June of 2022.
- The FDID Version Report will contain the list of FDIDs for the Industry Member that have been accepted as an LTID Account Phase submission, have not been ended in CAIS, and have not been accepted as a Full CAIS Phase submission in the Production Environment.
- These FDIDs are required to be accepted in the Production Environment in the Full CAIS Phase schema, or ended in CAIS, on or before July 11, 2022.

Full CAIS Go-Live

- The Full CAIS (Phase 2e) Production Go-Live Date for all Industry Members is July 11, 2022.
- Starting at approximately 8 am ET on July 10, 2022, all submissions to all Environments must be in the Full CAIS Phase format, no matter when the Industry Member received the data.
- Additionally, after code deployment on July 10, 2022:
 - All data and TID files must follow schema version 2.0.0 or higher. Any files that are received after code deployment on July 10, 2022 with a prior schema version will reject.
 - All data, including repairs and corrections for rejections that originated prior to code deployment on July 10, 2022 must be reported in the Full CAIS Phase format.

Full CAIS Cutover Deployment

- FINRA CAT will communicate via email and system announcements when the code deployment is complete.

- **Recommendation:**
 - Due to code deployment in all environments on July 10, 2022
 - CAT Reporters should not submit any files in the LTID Account Phase schema (v1.0.0) after 11:59 pm ET on July 9, 2022.
 - CAT Reporters should not submit any files to any environment on July 10, 2022
 - Submissions for the July 11, 2022 CAT Processing Date should not begin until notification that the Full CAIS Phase deployment is completed.

Feedback and Repairs

- After Full CAIS Phase code deployment to each environment:
 - LTID Phase (v1.0.0) submissions
 - Will be validated against the LTID Phase file and record schema.
 - Feedback for LTID Phase submissions will be provided in in the CAIS Data Feedback file in the Full CAIS Phase (v2.0.0) format - omitting attributes that are not applicable for LTID Phase submission - e.g., receivedNaturalPersonRecordCount, successfulNaturalPersonRecordCount, receivedLegalEntityRecordCount, successfulLegalEntityRecordCount.
 - No Identifiers Feedback nor Submission Inconsistencies Feedback files will be generated for the LTID Phase Submissions.
 - Full CAIS (v2.0.0) submissions
 - Will be validated against the Full CAIS Phase file and record schema.
 - Feedback for Full CAIS Phase submissions will be provided in the CAIS Data Feedback, CAIS Identifiers Feedback, and CAIS Submission Inconsistencies Feedback files in the Full CAIS Phase (v2.0.0) format.
 - Any FDID record rejections must be repaired by the Repair Deadline.
- Any outstanding LTID Account Phase rejections as of July 10, 2022, must be repaired in the Full CAIS Phase format
 - Because CAIS data is PII and cannot be returned to the CAT Reporter, data is not included in the feedback file to assist with resubmission
 - For this reason, CAT Reporters are encouraged to transition away from version 1.0.0 to version 2.0.0 during the Transition Period (April 24, 2022 through July 10, 2022)

Full CAIS Phase Schema Updates

- The transition from LTID Account Phase to Full CAIS Phase 2e includes modifications to the current CAIS Data submission file, as well as the introduction of the new TID file.
- A detailed list of schema changes between LTID Account Phase and Full CAIS Phase 2e, new record types and the TID file layout, is as follows below.
- Further information can be found in the Full CAIS Industry Member Technical Specifications.

New CAIS Data File Fields

JSON Object Level	Change Description	Field Name
Main	New conditional field added	correspondentCRD
	New required field added	naturalPersonCustomerRecordCount
	New required field added	legalEntityCustomerRecordCount
	New conditional multi-dimensional added	naturalPersonCustomerList
	New conditional multi-dimensional added	legalEntityCustomerList
	New conditional field added	correctingCustomerRecordID
FDID	New required field added	accountType
	New required field added	accountName
	New conditional field added	primeBrokerID
	New conditional field added	bankDepositoryID
	New conditional field added	clearingBrokerID
	New conditional field added	branchOfficeCRD
	New optional field added	registeredRepCRD
	New conditional field added	priorCATReporterCRD
	New conditional field added	priorCATReporterFDID
	New required multi-dimensional array added	addressList
	New conditional multi-dimensional array added	fdidCustomerList

New CAIS Data File Fields

JSON Object Level	Change Description	Field Name
FDID Address List	New required field added	addrType
	New required field added	addrLine1
	New conditional field added	addrLine2
	New conditional field added	addrLine3
	New conditional field added	addrLine4
	New required field added	city
	New conditional field added	regionCode
	New required field added	countryCode
	New conditional field added	postalCode
FDID Customer List	New required field added	role
	New conditional field added	hasDiscretion
	New required field added	roleStartDate
	New conditional field added	roleEndDate
	New conditional field added	roleEndReason

New CAIS Data File Fields

JSON Object Level	Change Description	Field Name
Natural Person Customer	New required field added	customerRecordID
	New required field added	firstName
	New optional field added	middleName
	New required field added	lastName
	New optional field added	nameSuffix
	New conditional field added	doingBusinessAs
	New required field added	yearOfBirth
	New required field added	customerType
	New conditional field added	updateNotification
	New conditional multi-dimensional array added	addressList
Natural Person Address List	New required field added	addrType
	New required field added	addrLine1
	New conditional field added	addrLine2
	New conditional field added	addrLine3
	New conditional field added	addrLine4
	New required field added	city
	New conditional field added	regionCode
	New required field added	countryCode
	New conditional field added	postalCode

New CAIS Data File Fields

JSON Object Level	Change Description	Field Name
Legal Entity Customer	New required field added	customerRecordID
	New required field added	legalName
	New conditional field added	ein
	New required field added	customerType
	New conditional field added	lei
	New conditional field added	updateNotification
	New conditional multi-dimensional array added	addressList
Legal Entity Address List	New required field added	addrType
	New required field added	addrLine1
	New conditional field added	addrLine2
	New conditional field added	addrLine3
	New conditional field added	addrLine4
	New required field added	city
	New conditional field added	regionCode
	New required field added	countryCode
	New conditional field added	postalCode

New CAIS TID File Fields

JSON Object Level	Change Description	Field Name
Main	New required field added	version
	New required field added	tidRecordCount
	New conditional multi-dimensional array added	tidRecordList
TID Record List	New required field added	customerRecordID
	New required field added	tidType
	New conditional field added	foreignTIDType
	New conditional field added	foreignTIDCountryCd
	New required field added	tidValue
	New conditional field added	replacedByTIDType
	New conditional field added	replacingForeignTIDType
	New conditional field added	replacingForeignTIDCountryCd
New conditional field added	replacedByTID	

Changes to Existing LTID Phase Fields – Retired

Event Type Code	Key
fdidEndDateNULL	Conditional
fdidEndReasonNULL	Conditional
replacedByFDIDNULL	Conditional
ltidEndDateNULL	Conditional
ltidEndReasonNULL	Conditional

CAIS Reporter Portal Functionality

- CAIS Reporter Portal will facilitate submission of either LTID Phase or Full CAIS Phase submissions during the transition period (April 24-July 10, 2022). The LTID Phase reporting functionality will be deprecated on July 11, 2022 – no further LTID Phase reporting will be accepted once the Full CAIS Mandatory Reporting deadline has been reached.
- A toggle within the UI will allow users to flip between LTID Phase and Full CAIS Phase reporting.
- **NOTE** – example screens in this deck are conceptual mock-ups and not yet finalized; as such, the final screens may change. An updated CAIS Reporter Portal user guide will be published with details on the finalized functionality.

Example Screen – LTID Phase File Upload

- 'Full CAIS' toggled OFF
- Allows upload of LTID Phase files in the same manner as current CAIS Reporter Portal functionality
- Records must only have LTID Phase attributes

The screenshot displays the 'Submission Management' interface for a Reporter CRD of '1234 Reporting Firm Inc.'. The interface includes a navigation bar with tabs for 'File Submission', 'Manual Submission', 'Submission in Progress', 'Completed Submissions', 'Rejections', and 'Inconsistencies'. Below the navigation bar, there is a 'Submission Record for' section with 'CAT Reporter CRD: 1234' and 'CAT Submitter ID: 1234'. A red circle highlights a toggle switch labeled 'NEW! Full CAIS', which is currently turned off. To the right of the toggle are 'RESET' and 'SUBMIT' buttons. The main content area features a dashed box for file upload with the text: 'Drag and drop files here or [browse](#)'. Below this, it states: 'Only LTID Phase (version 1.0.0) files can be uploaded here. To upload Full CAIS (version 2.0.0) files, turn on Full CAIS in the upper-right.' On the right side, there are two panels: 'Resources' with links for 'CAIS Reporter User Guide' and 'CAIS Technical Specification', and 'File Requirements' which lists: '- Maximum of 5 files per submission', '- Individual files are limited to a maximum uncompressed size of 1GB', '- Files must be in .json format', '- Files must be compressed using BZip2', and '- File name must use the following format: <CAT Submitter ID>_<CAT Reporter CRD>_<File Generation Date>_<File Kind>_<File Number>.<Format Extension>.<Compression Extension>'. An example filename is provided: '123_456_20201020_CAIS_000001.json.bz2'.

Example Screen – Full CAIS Phase File Upload

- 'Full CAIS' toggled ON
- Allows upload of paired Full CAIS files – Data File and Transformed Identifiers File – within the UI
- Records must have Full CAIS attributes – including customer associations and data

The screenshot displays the 'Submission Management' interface for a reporting firm. At the top right, the 'Reporter CRD' is set to '1234 Reporting Firm Inc.'. Below this, a navigation bar includes tabs for 'File Submission', 'Manual Submission', 'Submission in Progress', 'Completed Submissions', 'Rejections', and 'Inconsistencies'. The 'File Submission' tab is active. The main area shows 'Submission Record for: CAT Submitter ID: 1234 CAT Reporter CRD: 1234'. A toggle switch for 'Full CAIS' is turned on, with a 'NEW!' indicator. 'RESET' and 'SUBMIT' buttons are visible. A yellow warning box states: 'Once an FDID is accepted in a Full CAIS (Customer & Account) submission, all subsequent submissions of the FDID must also be submitted using a Full CAIS submission. Submitting an FDID accepted to Full CAIS using the LTID Phase version will result in a rejection.' Below this is a large dashed box for file upload, labeled 'Drag and drop' and 'CAIS Data Files & Transformed Identifiers Files'. A 'browse' link is provided. A note explains that Customer and Account Data files are routed to the CAIS Data Subsystem, while Transformed Identifiers files are routed to the CCID Subsystem. On the right, a 'Resources' section contains links for 'CAIS Reporter User Guide' and 'CAIS Technical Specification'. A 'File Requirements' section lists: maximum of 5 file pairs per submission; CAIS Data Files must be uploaded with their corresponding Identifiers (TIDs) Files; individual files are limited to 100,000 FDID records and 100,000 customer records, with a maximum uncompressed size of 1GB; files must be in .json format; files must be compressed using BZip2; and file names must use the following format: <CAT Submitter ID>-<CAT Reporter CRD>-<File Generation Date>_<Group>_<File Kind>-<File Number>-<Format Extension>-<Compression Extension>. An example shows: 123_456_20201020_CAIS_000001.json.bz2 and 123_456_20201020_TIDS_000001.json.bz2.

Example Screen – LTID Phase Manual Entry

- 'Full CAIS' toggled OFF
- Allows entry of FDID records following the LTID Phase version schema
- Very similar to current LTID Phase functionality – only minor layout revisions

Submission Management

Reporter CRD: 1234 Reporting Firm Inc. ▼

File Submission **Manual Submission** Submission in Progress Completed Submissions Rejections Inconsistencies

Submission Record for: CAT Reporter CRD: 1234 CAT Submitter ID: 1234 NEW! Full CAIS [RESET](#) [NEXT](#)

FDID Record

* Firm Designated ID: ⓘ

* FDID Type: ▼ ⓘ

* FDID Date: ⓘ

FDID End Date: ⓘ

FDID End Reason: ▼ ⓘ

LTID Record Associations

Please add or select an association to update. Associations can only be added when the FDID Recrd is in a valid state.

[ADD ASSOCIATION](#)

Example Screen – Full CAIS Phase Manual Entry

- 'Full CAIS' toggled ON
- Allows entry of attributes following Full CAIS version schema
- Left-side hierarchy view will show customer associations as they're added to the submission
- Only one FDID submission at a time – plus all associated customers and LTIDs
- Includes in-browser mechanism for converting Input Identifier to Transformed Identifier

Submission Management

Reporter CRD: 1234 Reporting Firm Inc. ▼

File Submission Manual Submission Submission in Progress Completed Submissions Rejections Inconsistencies

Submission Record for: CAT Reporter CRD: 1234 CAT Submitter ID: 1234 NEW! Full CAIS

▼

New FDID Record

FDID Record

* Firm Designated ID: ⓘ

* FDID Type: ⓘ

* Account Type: ⓘ

* Account Name: ⓘ

* FDID Date: ⓘ

* Prime Broker ID: ⓘ

Clearing Broker ID: ⓘ

* Branch Office CRD: ⓘ

Registered Representative CRD: ⓘ

FDID End Date: ⓘ

FDID End Reason:

Once an FDID is submitted in the Full CAIS manual submission form, all subsequent submissions of that record must be made using the Full CAIS Manual Submission UI, File Submission UI, or SFTP. Submitting the record to the LTID Phase Manual Submission UI, File Submission UI, or SFTP will result in a rejection.

Full CAIS Cutover Resources

- [Full CAIS Phase 2e Industry Member Technical Specifications](#)
- [CAT CAIS Registration & Onboarding Guide](#)
- A CAT Alert and the Full CAIS Phase Schema (v2.0.0) are forthcoming

FINRA CAT Helpdesk

Questions may be directed to the FINRA CAT Helpdesk at 888-696-3348 or help@finracat.com

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- **For participants using computer audio:**
 - Click the “Raise Hand” button at the bottom of the participant’s window.
 - A visual prompt will indicate that your line has been unmuted.
- **For participants using phone audio:**
 - Enter *9 on your phone keypad.
 - An audio prompt will indicate that your line has been unmuted.