Full CAIS: Tools Available for Industry Member Use

6/21/2022

# Agenda

- Overview of Available Tools
- CAT NMS Plan Requirements
- ▶ FDID Reconciliation Report
- ▶ FDID Version Report
- Full CAIS Data Submissions and Resubmissions
- Full Data Replacement
- CAIS Resources
- Q&A

### Overview of Available Tools

- Reports containing information on previously accepted CAIS records:
  - FDID Reconciliation Report (CAIS Reporter Portal)
  - FDID Version Report (CAIS Reporter Portal and posted weekly to SFTP)
- How to enact change on previously accepted CAIS records:
  - Resubmit the same FDID Record with all current LTID and Customer associations
  - Full Data Replacement

#### CAT NMS Plan Requirements

- ▶ The CAT NMS Plan prohibits PII from being returned to CAT Reporters once submitted to CAIS.
- ▶ This means that CAT Reporters cannot view the current version of records.
- Given the above and based on industry feedback, Full CAIS was designed such that CAT Reporters must submit the full FDID record including all LTID and Customer associations upon original submission and when changes are required.
- There are also several tools available to CAT Reporters to assist with determining which records have been accepted by CAIS.

## FDID Reconciliation Report

- Available within the Reports section of the CAIS Reporter Portal
- Allows user to upload a file containing a limited set of FDIDs, and retrieve limited information about the FDIDs, including:
  - If FDID has been accepted into CAIS
  - Correspondent CRD listed on the FDID
  - Name of file it was last accepted within
  - Version (LTID or FULL CAIS)
  - Status (Active/Inactive/Not Found)
  - Count of associated customers in latest submission
  - Masked portion of LTIDs reported on the FDID first 5 characters are "x"

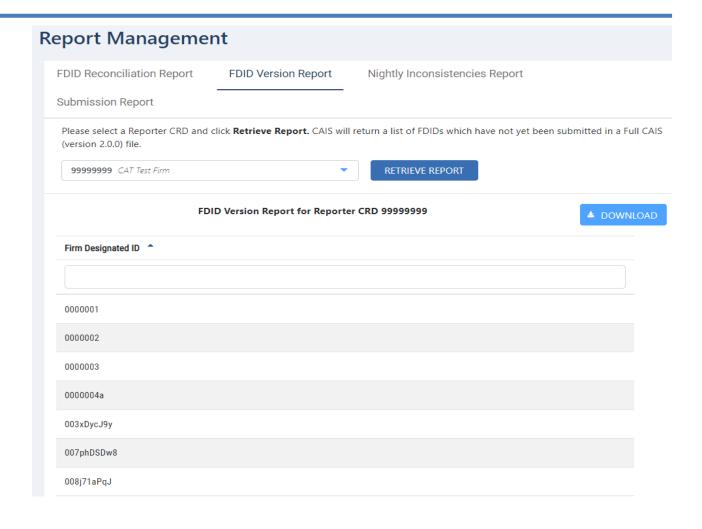


Α	В	С	D	E	F	G	Н
Firm Designated ID	Correspondent CRD	FDID Status	Associated Customer Count	Last Accepted File Name	Version	Large Trader ID	LTID Status
rWoCjFAk4p		ACTIVE	0	99999999_99999999_20220427_caisweb_CAIS_705451.json.bz2	LTID_PHASE		
lLgG2snTeb		ACTIVE	0	99999999_99999999_20201008_CAIS_210092.json.bz2	LTID_PHASE	xxxxx522-6922	ACTIVE
Multiple Customers Example		ACTIVE	2	99999999_9999999_20220425_UpdtTst_CAIS_000001.json.bz2	FULL_CAIS		
UNKNOWN FDID		NOT_FOUND					

User must select the specific CAT Reporter CRD for the upload. Reporting Agents can select any CRD for which they have a currently active CAIS Reporting Relationship.

## **FDID Version Report**

- Available within the Reports section of the CAIS Reporter Portal
  - Posted weekly to SFTP to the SFTP Reports directory
- Returns list of FDIDs accepted in an LTID Phase submission that are not ended and have not been accepted in a Full CAIS submission
- User must select the specific CAT Reporter CRD for the report.
  - Downloads are limited to 200,000 FDIDs
- Reporting Agents can select any CRD for which they have a currently active CAIS Reporting Relationship
  - If the Reporting Agent was not the latest Submitter for the FDID, it will not be present in its report



# FDID Version Report- Other Highlights

- The FDID Version Report can be used to identify FDIDs reported in the LTID phase that were not ended or reported to Full CAIS.
- CAT Alert 2021-04: Phase 2e: Transitioning from LTID Account Phase to Full CAIS Phase
  - Industry Members are not required to submit to Full CAIS a full set of Customer Account Information and Customer Identifying Information for any inactive FDIDs reported in the LTID Account Phase.
  - It is expected that the FDID Version Report may contain FDIDs submitted in the LTID Account Phase that are not considered Active Accounts and not required to be submitted to Full CAIS.
  - Industry Members may, but are not required to, remove these FDIDs from the FDID Version Report by ending the inactive FDIDs in the LTID Account Phase (schema v1.0.0) with an fdidEndReason of 'ENDED' or submit them to Full CAIS (schema v2.0.0).

#### Full CAIS Data Submissions and Resubmissions

- For the Full CAIS Phase, CAT Reporters are required to submit the full current state of all FDID Records including all current LTID and Customer associations in both the original FDID Record submission and any subsequent FDID Record resubmissions.
- CAT Reporters must reference the most recently accepted submission of their record to understand its current full state.
- To be sure that the FDID Record stored in CAIS is the current full state, the CAT Reporter can resubmit the FDID Record will all current LTID and Customer associations.

# Full Data Replacement

- The Full Data Replacement allows for the ending of all previously accepted FDIDs and their associations to Customers and LTIDs.
- All previously accepted data is retained within CAIS and available for Regulator view only a systemic End Reason and End Date is applied.
- Full Data Replacement also results in closure of all outstanding rejections and Material Inconsistencies for the CRD
  - Any Material Inconsistency closed in this manner will not have the 365 day "grace period"
  - Resubmission of the Customer Record may still result in a Material Inconsistency.
- Full Data Replacement requires contacting the FINRA CAT Helpdesk and scheduling the replacement operation.
  - Requires at least two days advance notice to schedule the Full Data Replacement.
  - The duration of the Full Data Replacement operation is variable based on the volume of previously accepted records; however it is expected to require between 1 and 4 hours.
- The Full Data Replacement operation cannot occur until all currently processing submission files for the CRD have completed.
- Additionally, during the Full Data Replacement, CAIS will not accept a new submission file for the CRD any submission under the CRD will result in a File Integrity Error.

# Full Data Replacement - Other Highlights

#### Test Environment:

- Allows CAT Reporters to quickly clear rejections and Material Inconsistencies in order to continue testing.
- Production Compliance Go-Live:
  - After the Production Compliance Go-live date, use of the Full Data Replacement will be approved in very limited circumstances.
- ▶ For more information on the Full Data Replacement, please contact FINRA CAT Helpdesk at help@finracat.com or (888) 696-3348

#### **CAIS** Resources

- For more information on the FDID Reconciliation Report:
  - CAT CAIS Reporter Portal User Guide
  - <u>Video Tutorials</u> Part 3 Demo Covers the FDID Reconciliation
- For more Information on FDID Version Report:
  - CAT Alert 2021-04-Phase 2e: Transitioning from LTID Account Phase to Full CAIS Phase
  - Full CAIS Technical Specifications for Industry Members
- ▶ For more information on CAIS Data Submissions:
  - CAT CAIS Technical Specification Working Group Q&A November 2, 2021
  - CAT CAIS Industry Member Reporting Scenarios Full CAIS Phase
- Other Resources:
  - CAT CAIS- Known Issues List (Full CAIS) and Planned Full CAIS Technical Specifications Updates
  - Section Q of the FAQs
  - CAIS industry webinars (Past Events and Future Events)

### FINRA CAT Helpdesk

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

Q&A

#### How to Ask a Question during Today's Call

#### For participants using computer audio:

- Click the "Raise Hand" button at the bottom of the participants 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.