

## STANDARDS FOR COMPLETING THE CUSTOMER AND ACCOUNT REPORTING DISCLOSURE FORM

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### Revision Summary

Version	Publish Date	Description
1.0	04/26/2021	Initial Publication.
1.1	10/06/2022	Updated the document to conform with the revised Full CAIS Compliance Go-Live date.
1.2	11/29/2022	Updated the document to conform with the revised Full CAIS Compliance Go-Live date.

### 1. Overview & Purpose

The Customer and Account Reporting Disclosure Form is used for two purposes:

(1) Type 1 Disclosure (optional): Industry Members and CAT Reporting Agents may choose to self-report issues related to an Industry Member’s Customer and Account Information (“CAIS”) submissions (e.g., erroneously reported Customer and Account Information, non-reporting or other data issues). This type of disclosure is not required.

(2) Type 2 Disclosure (required): Industry Members and CAT Reporting Agents must use this Form to notify FINRA CAT of changes in Firm Designated ID (“FDID”) associated with a trading account prior to such information being reported to CAT CAIS. As outlined in FAQ [M16](#), Industry Members are required to notify FINRA CAT of FDID changes via the Customer and Account Reporting Disclosure Form if such FDID changes have not been successfully reported to the CAT CAIS system. In addition to submitting the Form, Industry Members are required to create and maintain a mapping of the prior FDID(s) to the replacing FDID(s) and produce it upon regulatory request. **Industry Members and CAT Reporting Agents must not provide this mapping to FINRA CAT or provide it as part of the Form.**

The primary purpose of the Form is to provide information to FINRA CAT so it can evaluate the impact of the reported incident or FDID changes on the quality of the CAT CAIS Data and to provide notice to the Regulatory Users of reported disclosures that may impact their use and analysis of CAT CAIS Data when using it to fulfill their regulatory obligations.

This alert provides information about self-reporting, including who may self-report, when to self-report, the considerations for when to self-report, and how to complete and submit the Customer and Account Reporting Disclosure Form.<sup>1</sup> If an Industry Member or CAT Reporting Agent has questions about the Form or the process of submitting the Form they should contact the FINRA CAT Helpdesk.

The Customer and Account Reporting Disclosure Form is separate and distinct from other Self Reporting Forms. For information on other Self Reporting Forms, please visit the Forms page of the CAT website at <https://www.catnmsplan.com/forms>. The Erroneous Events Self Reporting Form and Self Reporting Clock Synchronizations Deviation Form are accompanied by CAT Alerts 2020-04 (Standards For Self Reporting Erroneous Events to FINRA CAT) and 2020-02 (Standards for Self Reporting Deviations of Clock Synchronization Standards to FINRA CAT), respectively, at <https://catnmsplan.com/cat-alerts>.

## 2. Who May Self-Report

Either an Industry Member or CAT Reporting Agent may contact the FINRA CAT Helpdesk or submit the Customer and Account Reporting Disclosure Form to self-report. It is not necessary for both an Industry Member and its CAT Reporting Agent(s) to self-report the same issue; however, an Industry Member should ensure that the information submitted on its behalf by a CAT Reporting Agent is timely and accurate.

## 3. Self-Reporting and Disclosure Considerations

**Industry Members must not disclose personally identifiable information (“PII”) on the Form.** Examples of PII may include, but are not limited to, social security number, tax identifier number or similar information; Customer Identifying Information and Customer Account Information. See CAT FAQs [Q1](#), [Q7](#) and [S6](#) for more examples.

**Industry Members making a Type 2 Disclosure must not provide FDID mapping information to FINRA CAT on this Form, but must maintain such documentation, and make it available to Regulators upon request.**

### Type 1 Disclosure: Optionally Disclosing Issues with Customer and Account Information (“CAIS”) Submissions

While there is no requirement to self-report issues with CAIS reporting to FINRA CAT, Industry Members and CAT Reporting Agents are encouraged to use the Customer and Account Reporting Disclosure Form to report information that was erroneously reported to the CAT Customer and Account Information System and other CAT CAIS data errors that are

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<sup>1</sup> The Customer and Account Reporting Disclosure Form may be updated on a periodic basis.

not identified in the Feedback and Corrections process as outlined in the CAT Reporting Customer and Account Technical Specifications for Industry Members. Industry Members and CAT Reporting Agents using the Form to self-report information that was erroneously reported to CAT CAIS or other CAT CAIS data errors must only do so if there is no associated CAT CAIS error feedback and the Industry Member did not correct prior to 5:00 pm Eastern Time on the third Trading day after the account information became available to the Industry Member (T+3). It is not necessary to use the Form to self-report errors that were identified through CAT CAIS error feedback and/or corrected, repaired or deleted prior to 5 pm ET on T+3.

Other broad examples of events that might be reported using this form include, but are not limited to, a failure to report Customer and Account Information to CAT CAIS or reporting inaccurate data to CAT CAIS.<sup>2</sup> Industry Members and CAT Reporting Agents are also encouraged to use the Form to self-report CAT CAIS reporting errors that affect a material number of records for a particular CAT Trading Day, a material number of particular record fields (for example, all FDIDs in a particular file or batch of files) and/or that persisted for several days or more. It is not necessary to self-report de minimis CAT CAIS reporting errors; however, Industry Members and CAT Reporting Agents may do so.

Whether or not a Customer and Account Reporting Disclosure Form is submitted, an Industry Member or its CAT Reporting Agent should submit the correct information required to be reported to CAT CAIS, even if it is unable to submit the data prior to 5 pm ET on T+3, to ensure that the accurate data becomes part of the audit trail. The Plan Participants recognize that there are circumstances wherein an Industry Member or CAT Reporting Agent may not be able to submit the corrected data to CAT. The reason(s) for the Industry Member or CAT Reporting Agent's inability to do so should be explained in Item 27 of Part 3 of the Customer and Account Reporting Disclosure Form.

#### Type 2 Disclosure: Required Disclosure of Changes in FDID

As outlined in FAQ [M1](#), a change in the FDID associated with a particular trading account would only be permissible in certain limited circumstances, such as closed accounts, system migration, and change of vendors. Per FAQ [M16](#), if an Industry Member has reported an FDID on a Transaction Order event (e.g., MENO, MEOF, MEOT) and subsequently changed the FDID associated to that particular trading account prior to the implementation of full Customer and Account Reporting on March 17, 2023, then the Industry Member must either 1) report the change of FDID to CAT CAIS as outlined in Scenario 3.1 (Updating an FDID) of the CAT CAIS Industry Member Reporting Scenarios document or 2) notify FINRA CAT of FDID changes via the Customer and Account Reporting Disclosure Form. Industry Members choosing to complete the Form are also required to create and maintain a mapping of the prior FDID(s) to the replacing FDID(s) and

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<sup>2</sup> The CAT NMS Plan requires Industry Members to report Received Industry Member Data, which includes customer and account data, by 8:00 a.m. Eastern Time on the CAT Trading Day following the day the Industry Member receives such Received Industry Member Data. All creation of, or modifications to, CAT reportable accounts are required to be submitted to CAT CAIS by 8:00 a.m. Eastern Time on the CAT Trading Day following the day such information was received by the Industry Member.

produce it upon regulatory request. **Industry Members and CAT Reporting Agents must not provide this mapping to FINRA CAT or provide it as part of the Form.**

#### **4. When to Self-Report**

##### Type 1 Disclosure: Optionally Disclosing Issues with Customer and Account Information (“CAIS”) Submissions

Industry Members and CAT Reporting Agents may self-report at any time.

The Plan Participants encourage Industry Members (and CAT Reporting Agents) that have identified an issue that affects its CAT CAIS reporting compliance obligation, to either call the FINRA CAT Helpdesk or submit the Customer and Account Reporting Disclosure Form as soon as practicable, even if the root cause of the issue has not been resolved. Parts 1 and 2 of the form may be submitted upon discovery of the erroneous CAT CAIS reporting, and supplemental information can be provided in Part 3 of the Form as it becomes available.

##### Type 2 Disclosure: Required Disclosure of Changes in FDID

The Form should be submitted within two weeks of the FDID change. FDID changes that occurred subsequent to the date that an Industry Member was required to report to CAT CAIS, but prior to the publication of this Alert and the associated Customer and Account Reporting Disclosure Form, should be reported within a reasonable period of time so that the FDID change information can be provided to regulators, if necessary.

#### **5. How to Complete the Customer and Account Reporting Disclosure Form**

The Customer and Account Reporting Disclosure Form is a web-based Form available at <https://catnmsplan.com/forms>.<sup>3</sup> It must be completed and submitted electronically.

Specific information, including the Data Type, Character Limits, Field Description, and Include Key are included in the Appendix of this CAT Alert.

Complete all Required Fields (marked with an asterisk) in Parts 1 and 2. The Form may be submitted once all required fields are completed. Part 3 contains fields marked as Optional and Conditional. Optional fields are not required but are available for CAT Reporters and CAT Reporting Agents to provide as much detail as necessary to voluntarily self-report. Conditional fields are required depending on the information provided in related fields.

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<sup>3</sup> For best results, complete this Form using a Google Chrome browser.

Review all information before Submitting<sup>4</sup>.

Once the Form has been Submitted, select Print to print a copy of the Form for books and records.

Upon submission of the Form and processing by FINRA CAT (usually within one business day), an email will be sent to the email address provided in Part 1. This email will certify submission and provide a Case Number. Save or Print a copy of this email for books and records.

Industry Members and CAT Reporting Agents may revise or add information to the Form after it was submitted. **The Case Number that was provided by email is required in order to do this.** Additionally, Industry Members and CAT Reporting Agents may submit Parts 1 and 2 without completing Part 3. Part 3 may be completed at a later time. **The Case Number that was provided by email is also required in order to do this.**

Please contact the FINRA CAT Helpdesk if the Case Number is not able to be located or additional help is required to complete Parts 1, 2 or 3 of this Form.

#### Type 1 Disclosure: Optionally Disclosing Issues with Customer and Account Information (“CAIS”) Submissions

Only report a single issue per Form. If the root cause created multiple reporting issues, this may be reported on a single Form. Multiple, unrelated issues with CAIS submissions must be reported on separate Forms.

#### Type 2 Disclosure: Required Disclosure of Changes in FDID

Changes to FDIDs resulting from a single circumstance (such as a change of vendor) may be reported on a single Form. It is not necessary to submit separate Forms for each FDID being changed. Multiple, unrelated changes to FDIDs must be reported on separate Forms.

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<sup>4</sup> Functionality for saving the Form without submitting it is not available. It is recommended that Industry Members prepare Form submissions using the Appendix before completing the Form.

## Appendix: Instructions for Completing the Customer and Account Reporting Disclosure Form

The Appendix is intended to be used in conjunction with CAT Alert 2021-02.

### Part 1. Administrative and Contact Information

Item #	Item Name	Data Type (character limit)	Description	Include Key	Applicable to Disclosure Type
1	Disclosure Status	Radial	<p>Select <i>New Disclosure</i> if you are disclosing an issue or change in FDID for the first time and do not have a FINRA CAT Helpdesk Case Number.</p> <p>Select <i>Subsequent Submission</i> if you previously submitted the Form, have a FINRA CAT Helpdesk Case Number and are returning to revise or add information to the Form.</p>	Required	Types 1 and 2
2	FINRA CAT Helpdesk Case Number	Case Number (CAS-_-_)	<p>Enter the Case Number provided by email after the Form was submitted. Required if this is a Subsequent Submission. Must be in the correct format. Not case sensitive.</p> <p>Call the FINRA CAT Helpdesk if the correct Case Number is unable to be located.</p>	Conditional	Types 1 and 2
3	Confirm FINRA CAT Helpdesk Case Number	Case Number (CAS-_-_)	Must be an exact match of the Case Number provided in Item 2.	Conditional	Types 1 and 2
4	Date of Initial Disclosure Submission	Date (mm/dd/yyyy)	Date that the Form was originally submitted. Required if this is a Subsequent Submission.	Conditional	Types 1 and 2

5	Contact Name	Text (255)	First and last name of the person who can be contacted if more information is needed.	Required	Types 1 and 2
6	Email Address	Text (255)	Email address where the confirmation email and Case Number will be sent. Must be a valid and monitored email address.	Required	Types 1 and 2
7	Confirm Email Address	Text (255)	Must be an exact match of the email address provided in Item 7.	Required	Types 1 and 2
8	Phone Number	Numeric (10) ###-###-####	Phone number of the person who can be contacted if more information is needed.	Required	Types 1 and 2
9	Additional Contacts	Text (1000)	First and last name of additional people who can be contacted if more information is needed. You may also provide phone numbers and email addresses in this fields.	Optional	Types 1 and 2

Part 2. Identification of Customer and Account Information (CAIS") Data Issue

Item #	Item Name	Data Type (character limit)	Description	Include Key	Applicable to Disclosure Type
10	CAT Reporter Name (Firm Name)	Text (255)	Name of the Industry Member or CAT Reporting Agent submitting the Form.	Required	Types 1 and 2
11	CAT Reporter CRD (Firm CRD)	Numeric (9)	CRD number of the Industry Member submitting the Form or the Organization ID of the CAT Reporting Agent submitting the Form.	Required	Types 1 and 2

12	CAT CAIS Submitter Type	Radial	<p>Select the one that applies to this disclosure.</p> <p><i>Self-Reporting CAT Submitter:</i> Self-Reporting Industry Member that reports to CAT CAIS on its own behalf.</p> <p><i>CAT Submitter Using CAT Reporting Agent:</i> Industry Member that uses a CAT Reporting Agent and is submitting the Form on its own behalf.</p> <p><i>CAT Reporting Agent:</i> CAT Reporting Agent submitting the Form on behalf of one or more Industry Members.</p>	Required	Types 1 and 2
12a	Identity of CAT Reporting Agent (s) and Submitter ID(s)	Text (255)	If <i>CAT Submitter Using CAT Reporting Agent</i> was selected in Item 12, enter the Name(s) and Submitter ID(s) of the CAT Reporting Agent(s). Required if <i>CAT Submitter Using CAT Reporting Agent</i> was selected in Item 12.	Conditional	Types 1 and 2
12b	Identity of CAT Reporter(s) CRD Number(s)	Text (255)	If <i>CAT Reporting Agent</i> was selected in Item 12, enter the Name(s) and CRD number(s) of the firm(s) on whose behalf this Form is being filed. Required if <i>CAT Reporting Agent</i> was selected in Item 12.	Conditional	Types 1 and 2
13	Type of Disclosure	Radial	<p>Select only one.</p> <p>Type 1 Disclosure: Disclosing Issues with Customer and Account Information Submissions (e.g., erroneously reported Customer and Account Information or other data issues).</p> <p>Type 2 Disclosure: Disclosing Changes in FDID. <i>Type 2 Disclosure only requires completion of Items marked as Required.</i></p>	Required	Types 1 and 2



			<i>Once all Required fields are completed, the Form may be Submitted.</i>		
14	Description of Disclosure	Text (5000)	If Type 1 Disclosure: For erroneous data submissions, list the fields Impacted (e.g. fdidRecordID, firmDesignatedID, replacedByFDID, etc.) and relevant Submission File Name and CAIS-assigned submissionID. For non-reporting, indicate a failure to report to CAT CAIS.  Type 2 Disclosure: A description of the reason(s) why the FDID(s) changed.	Required	Types 1 and 2
15	Start Date	Date (mm/dd/yyyy)	If Type 1 Disclosure: first date that the issue occurred.  If Type 2 Disclosure: date the FDID(s) changed.	Required	Types 1 and 2
16	Start Time	Timestamp HH:MM:SS AM/PM Eastern Time	Time that the issue first occurred, if known.	Optional	Type 1
17	Date Detected	Date (mm/dd/yyyy)	Date that the issue was first detected, if known.	Optional	Type 1
18	Time Detected	Timestamp HH:MM:SS AM/PM Eastern Time	Time that the issue was first detected, if known.	Optional	Type 1
19	Description of Detection Method	Text (255)	A description of how the issue was detected.	Optional	Type 1
20	Impact Count	Text (255)	Approximate number of Customer and Account records and/or files impacted and basis for determination of the count.	Optional	Type 1

Part 3. Resolution and Correction of Customer and Account (“CAIS”) Data submissions

Item #	Item Name	Data Type (character limit)	Description	Include Key	Applicable to Disclosure Type
21	Date Issue Was Corrected	Date (mm/dd/yyyy)	If the root cause of the issue disclosed in Part 2 was corrected, provide the date it was corrected.	Optional	Type 1
22	Time Issue Was Corrected	Timestamp HH:MM:SS AM/PM Eastern Time	If the root cause of the issue disclosed in Part 2 was corrected, provide the time it was corrected, if known.	Optional	Type 1
23	Issue is Ongoing	Checkbox	Select this box if the issue is ongoing.	Optional	Type 1
24	Were Mitigation Measures Taken	Radial	Select <i>No</i> if the CAT Reporter or CAT Reporting Agent has not incorporated enhancements aimed at preventing a reoccurrence of the issue.  Select <i>Yes</i> if the CAT Reporter or CAT Reporting Agent incorporated enhancements aimed at preventing a reoccurrence of the issue.	Optional	Type 1
25	Description of Mitigation Measures Taken	Text (5000)	Provide a description of the mitigation measures taken to prevent a reoccurrence of the issue. Required if Item 24 is marked as <i>Yes</i> .	Conditional	Type 1
26	Submission of the Corrected or Unreported Data	Radial	Select <i>No</i> if the CAT Reporter or CAT Reporting Agent was not able to successfully submit the corrected or unreported data to CAT CAIS.	Optional	Type 1

			Select <i>Yes</i> if the CAT Reporter or CAT Reporting Agent was able to successfully submit the corrected or unreported data to CAT CAIS.		
27	Details Regarding the Submission of the Corrected or Unreported Data	Text (5000)	<p>If <i>No</i> was selected in Item 26, provide an explanation as to why the corrected or unreported data cannot be submitted.</p> <p>If <i>Yes</i> was selected in Item 26, provide details regarding the date(s) (and time(s)), the correct or unreported records/files were submitted, the submission method (machine-to-machine or CAIS Reporter Portal) and file submission name(s).</p> <p>Required if Item 26 is populated with <i>yes</i> or <i>no</i>.</p>	Conditional	Type 1
28	Other Details Regarding this Disclosure	Text (5000)	Provide any other details that the CAT Reporter or CAT Reporting Agent would like to provide that have not been disclosed in Items 1- 27.	Optional	Type 1