

Phase 2e: Transitioning from LTID Account Phase to Full CAIS Phase

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1. Revisions Summary

Version	Publish Date	Description
1.0	10/19/2021	Initial publication.

2. Summary

This CAT Alert describes how Industry Members must transition from the LTID Account Phase of CAIS reporting to Full CAIS (Phase 2e) of CAIS reporting for data and Transformed Identifier (TID) submissions.

3. Test Environment Plan Overview

The CAT CAIS Industry Member Test Environment (“Test Environment”), CAT CAIS Industry Member Production Mirror Environment (“Prod-Mirror Environment”) and CAT CAIS Industry Member Production Environment (“Production Environment”) are used in concert to facilitate efficient testing for Industry Members and CAT Reporting Agents. As such, effective January 31, 2022, the Test Environment is available for testing of Phase 2e data. Full CAIS Phase metadata and data files submitted to the Test Environment must be formatted per the schema definitions and requirements for Phase 2e (schema version 2.0.0).

The obligation to report LTID Account Phase data remains until the Full CAIS Go-Live on July 11, 2022. As such, LTID Phase format (schema version 1.0.0) submissions will continue to be accepted in the Test Environment, Prod-Mirror Environment, and Production Environment until July 10, 2022. Any data submitted to the Test Environment in LTID Phase format will be accepted into the system, however it will not be accepted for Full CAIS Phase certification purposes.

Table 1: Summary of Acceptable Schema in Each Environment

	8 am ET on January 30, 2022 – April 23, 2022	8 am ET on April 24, 2022 – July 9, 2022	8 am ET on July 10, 2022 and beyond
Environment	Acceptable Schema(s)	Acceptable Schema(s)	Acceptable Schema
Industry Test Environment	Full CAIS Phase and LTID Account Phase	Full CAIS Phase and LTID Account Phase	Full CAIS Phase
Prod-Mirror Environment	LTID Account Phase	Full CAIS Phase and LTID Account Phase	Full CAIS Phase
Production Environment	LTID Account Phase	Full CAIS Phase and LTID Account Phase	Full CAIS Phase

Reporting Relationships must be established in each separate environment. Any Reporting Relationships established in an environment for the LTID Account Phase is retained for the Full CAIS Phase. Only user accounts with the CAIS LTID Production entitlement will have access to the

Production Environment, however it will not be possible to submit Full CAIS Phase files in the Production environment until the Industry Member has been certified for the Full CAIS Phase.

The functionality available in the Test and Production Environments for Phase 2e will be rolled out as per the following:

Table 2: Summary of the Full CAIS Phase 2e Rollout in the Test and Production Environments

Test Environment As of 1/31/2022	Test Environment As of 3/28/2022	Production Environment Opens As of 4/25/2022	Full CAIS Phase 2e Compliance Go-Live Production Environment As of 7/11/2022
Ingestion Industry Test Open for Machine-to-Machine File & Data Integrity Validations & Feedback CAT Customer Inconsistencies CAT Reporter Portal <ul style="list-style-type: none"> • Manual File Upload • Reporting Summary Statistics • Error Summary and Error Search including Error Correction • Manual Submission 	Automated Transfer Full Data Replacement CAT Reporter Portal <ul style="list-style-type: none"> • FDID Version Report 	LTID Phase (v1.0.0) Format and Full CAIS Phase (v2.0.0) Format accepted Production Open for Machine-to-Machine File & Data Integrity Validations & Feedback CAT Customer Inconsistencies CAT Reporter Portal <ul style="list-style-type: none"> • Manual File Upload • Reporting Summary Statistics • Error Summary and Error Search including Error Correction • Manual Submission • FDID Version Report (available in June 2022) 	LTID Phase (v1.0.0) Format Deprecated Data Integrity & CAT Customer Inconsistencies Repair Deadlines Enforced FDID records reported in LTID Phase records must either be reported and accepted as Full CAIS Phase records, or ended in CAIS

As a reminder, the Prod-Mirror Environment will also have deployments at the same time as the Production Environment deployments.

4. Full CAIS Phase Certification

Industry Members and CAT Reporting Agents are required to perform testing to demonstrate their ability to successfully submit data to Full CAIS prior to accessing the Full CAIS Production Environment. Testing is performed in the CAIS Industry Test Environment, utilizing the Full CAIS Phase file and record schemas, including file and attribute validations. CAT Reporters have no volume limitation and may submit full production-equivalent loads to the Industry Test Environment. Submission and feedback processes mirror those of the Production Environment. Testing certification must be completed prior to submitting full customer and account data to the Full CAIS Production environment.

The Full CAIS Production readiness certification requirements differ for Self-Reporting Firms, Clearing Firms and CAT Reporting Agents, Industry Members submitting only via CAT Reporting Agents, and firms that do not have Production FDIDs. Please see the [CAIS Onboarding Guide](#) for complete certification requirements.

5. Production Environment Phased Plan Overview

To facilitate the reporting of Full CAIS Phase records, the ability to report Full CAIS Phase submissions to the Production Environment will begin at approximately 8 am ET on April 24, 2022, via a code deployment. Prior to code deployment, all submissions to the Production Environment must be in LTID Phase format. During the period between April 24, 2022 and July 11, 2022, the regulatory requirement to report LTID Account Phase records remains, and it is acceptable during this period to report in both the LTID Account Phase and Full CAIS Phase schemas. **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.**

All active FDID records reported in the LTID Account Phase (v1.0.0) submission must be reported and accepted in a Full CAIS Phase (v2.0.0) submission on or before July 11, 2022. 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, 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. These FDIDs are required to be accepted in a Full CAIS Phase, or ended in CAIS, on or before July 11, 2022. The CAIS Report Card for Industry Members will contain the count of FDIDs remaining as LTID Account Phase records beginning with the July 2022 report card, and will be included for compliance counts beginning in the August 2022 report card.

Starting at approximately 8 am ET on July 11, 2022, all submissions to the Production Environment must be in the Full CAIS Phase format, no matter when the Industry Member received the data.

Additionally, after code deployment on July 11, 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 11, 2022 with a prior schema version will reject.
- All data, including repairs and corrections for rejections that originated prior to code deployment on July 11, 2022 must be reported in the Full CAIS Phase format.

CAT Reporters will have the ability to make repairs via the Reporter Portal in the Full CAIS Phase format after the Full CAIS Phase code deployment is complete (see Section 6, “Phase 2e Cutover Deployment Timeline”).

5.1. Full CAIS Phase Submission and Feedback

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)

5.2. 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 provided in Tables 3 and 4 below. A list of fields to be retired in the Full CAIS schema is provided in Table 5 below. Further information can be found in the [Full CAIS Industry Member Technical Specifications](#).

Table 3: Schema updates for CAIS Data file

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

JSON Object Level	Change Description	Field Name
	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
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

JSON Object Level	Change Description	Field Name
	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
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

JSON Object Level	Change Description	Field Name
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
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
	New required field added	addrType

JSON Object Level	Change Description	Field Name
Legal Entity Address List	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

Table 4: New CAIS TID File

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

JSON Object Level	Change Description	Field Name
	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

Table 5: Retired Fields

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

6. Full CAIS Phase 2e Cutover Deployment Timeline

The Full CAIS Phase Production Go-Live date for all Industry Members is July 11, 2022. The transition from the LTID Account Phase to Full CAIS Phase 2e schema in the Production Environment will begin on July 10, 2022. FINRA CAT will communicate the completion of the code deployment via email and System Announcements. It is recommended that submissions for the July 11, 2022 CAT Processing Date should not begin until notification that the Full CAIS Phase deployment is completed.

7. Full CAIS Phase 2e Cutover Resources

- [Full CAIS Phase 2e Industry Member Technical Specifications](#)
- Full CAIS Phase 2e Industry Member Schema
- [CAT CAIS Registration & Onboarding Guide](#)