

# **CAT Customer and Account Information System (CAIS) Industry Member Onboarding Guide**

1/12/2022

Version 1.8

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## Change Log

Version	Date Published	Description of Change(s)
1.0	08/17/2020	Guide initially published on the CAT NMS web site.
1.1	08/25/2020	<ul style="list-style-type: none"> <li>• Updated the Onboarding Overview and §7 to reflect that the Production Environment is not available until December.</li> <li>• Updated §1 Registration for CAIS to reflect the collection of approximate number of accounts.</li> <li>• Updated §6 to reflect testing certification expectations.</li> </ul>
1.2	09/15/2020	<ul style="list-style-type: none"> <li>• Updated §6 to clarify expectations for self-reporting firms, CAT Reporting Agents, and firms with no account information to be reported.</li> </ul>
1.3	11/4/2020	<ul style="list-style-type: none"> <li>• Updated §1 Register for CAIS to include the collection of the Legal Entity Identifier (LEI).</li> <li>• Updated §3 Create / Entitle CAT User Accounts for the CAIS Reporter Portal to reflect CAIS Release 1.1 updates for setting access to Industry Test and Production Environments.</li> </ul>
1.4	12/21/2020	<ul style="list-style-type: none"> <li>• Updated the following sections to reflect that a Production Mirror environment will not be provided for CAIS at this time: <ul style="list-style-type: none"> <li>○ §3.1 CAT System Environments</li> <li>○ §4.1 SFTP Environments</li> </ul> </li> </ul>
1.5	3/24/2021	<ul style="list-style-type: none"> <li>• Updated the following sections to reflect the availability of a Production Mirror environment: <ul style="list-style-type: none"> <li>○ §3.1 CAT System Environments</li> <li>○ §3.2 CAIS Reporter Portal User Types</li> <li>○ §4.1 Request for Secure File Transfer</li> <li>○ §5 Establish CAIS Reporting Relationships in the Industry Test Environment</li> <li>○ §6 Conduct Testing for Production Readiness</li> </ul> </li> <li>• Clarified §6 applies to Testing for Production Readiness for the LTID Phase</li> <li>• Updated §6 to clarify expectations for Industry Members Submitting via CAT Reporting Agents</li> <li>• Added §7 for Testing for Production Readiness for Full CAIS Phase <ul style="list-style-type: none"> <li>○ Moved Previous §7 to §8</li> </ul> </li> </ul>

1.6	8/25/2021	<ul style="list-style-type: none"> <li>• Cleaned up content in Section 6: Conduct Testing for Production Readiness for LTID Phase</li> <li>• Updated Section 7: Conduct Testing for Production Readiness for Full CAIS with the certification steps.</li> </ul>
1.7	10/5/2021	<ul style="list-style-type: none"> <li>• Updated Section 7: Conduct Testing for Production Readiness for Full CAIS to clarify expectations for submission of FDID records, Customer records, and TID Types for self-reporting firms and for Clearing Firms/CAT Reporting Agents.</li> </ul>
1.8	1/12/2022	<ul style="list-style-type: none"> <li>• Updated Section 3.1 to add clarification on the use of the CAT Test and CAT Prod access flags.</li> <li>• Updated Section 3.2 and Section 4.2 to clarify IM CAIS User Roles during the transition to Full CAIS.</li> </ul>

## Introduction

Rule 613 of the Securities Exchange Act of 1934 requires national securities exchanges and national securities associations (“SROs”) to submit a national market system plan to the Securities and Exchange Commission (“Commission” or “SEC”) to create, implement, and maintain a consolidated audit trail (the “CAT”) that would allow regulators to more efficiently and accurately track all activity in U.S. equity and listed options markets. Pursuant to Rule 613, the SROs filed with the Commission the National Market System Plan Governing the Consolidated Audit Trail (“CAT NMS Plan”), which was approved by the Commission on November 15, 2016.

Under Rule 613(g)(2), each member of a national securities exchange or national securities association is required to comply with all the provisions of the CAT NMS Plan. Relatedly, as mandated under Rule 613, the CAT NMS Plan requires each SRO to adopt rules requiring its members to comply with Rule 613 and the CAT NMS Plan, and to agree to enforce compliance by its members in that regard. Accordingly, each SRO has adopted rules requiring its members to comply with Rule 613 and the CAT NMS Plan. For example, see FINRA Rule 6800 Series.

The SROs jointly own Consolidated Audit Trail, LLC, which was formed by the SROs to arrange for and oversee the creation, implementation, and maintenance of the CAT as required under Rule 613. Thus, the CAT is a facility of each SRO.

For more information, refer to SEC Rule 613 at <https://www.sec.gov/rules/final/2012/34-67457.pdf> and the CAT NMS Plan at <https://www.catnmsplan.com/wp-content/uploads/2018/02/34-79318-exhibit-a.pdf>.

## CAT Customer and Account Information System (CAIS) Onboarding Overview

The CAIS Onboarding Guide provides information for CAT Reporters on how to gain access to the CAIS Test and Production Environments for the first time. Industry Members and CAT Reporting Agents that report CAIS and LTID information to CAT on behalf of Industry Members must complete the following steps to gain access to CAIS, including:

1. Register for CAIS
2. Designate CAIS Account Administrator(s)
3. Create / Entitle CAT User Accounts for the CAIS Reporter Portal
4. Request CAT Secure File Transfer Accounts
5. Establish CAIS Reporting Relationships
6. Conduct Testing for CAIS Production Readiness
7. Certify CAIS Testing Completion

This document provides instructions for completing each of these steps, as well as additional resources and information. Upon completion of these steps, access to the CAIS Production Environment will be authorized. **Note that the CAIS Production Environment will be available beginning in December 2020.**

**A separate onboarding guide that provides the steps for gaining access to transmit data to CAT and to the CAT Reporter Portal is available on the CAT NMS website. See the *Industry Member Onboarding Guide* available at <https://www.catnmsplan.com/registration>. It is assumed that CAIS onboarding will be done in conjunction with or following CAT onboarding. If the organization does not need CAT access but does need to access CAT CAIS, contact the FINRA CAT Help Desk to ensure that all appropriate steps are completed.**

### Questions

Questions related to this document may be directed to the FINRA CAT Help Desk at 888-696-3348 or at [help@finracat.com](mailto:help@finracat.com).

## Companion Documents

- CAIS Reporter Portal User Guide: <https://www.catnmsplan.com/cais-registration>
- Entitlement Reference Guide: <https://www.finra.org/filing-reporting/entitlement/reference-guide>
- Entitlement Reference Guide for Super Account Administrators:  
<https://www.finra.org/sites/default/files/2020-04/finra-entitlement-program-saa-reference-guide.pdf>
- Industry Member Onboarding Guide: <https://www.catnmsplan.com/transaction-registration>

## 1. Register for CAIS

- Any member of a national securities exchange or national securities association that handles orders or quotes in NMS equity securities, OTC equity securities, or listed options and any CAT Reporting Agent that is or will be authorized to submit data to CAT on behalf of an Industry Member must register in order to report to the CAIS system.
- The CAT Registration For Customer and Account Information (CAIS) and Large Trade Identification Number (LTID) Form must be submitted online at <https://www.catnmsplan.com/cais-registration>.

The information collected on the registration form includes:

- Company Name, Address, Type of Organization, CRD number or ORG ID<sup>1</sup>, Legal Entity Identifier (LEI)<sup>2</sup>
- Primary and Secondary Contact Name, Phone, Email
- Primary and Secondary Source of CAT CAIS Reporting (Self-Reporting or Vendor)
- Preferred Connectivity (SFTP and/or CAIS Reporter Portal)
- Type of Data Submission
- Approximate number of accounts that have associated LTIDs<sup>3</sup>

The registration form will be processed within two business dates of receipt.

Reporters that have no accounts with associated LTIDs or FDIDs to report at this time are still encouraged to complete the registration process in order to quickly and efficiently onboard in the future if and when necessary.

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<sup>1</sup> CAT Reporting Agents that have already been assigned an ORG ID must populate the field with that identifier. CAT Reporting Agents that do not have a CRD number or an existing ORG ID must leave the CRD number blank when entering Company Information. An ID will be assigned once a CAT Agreement is submitted and an account is created for an Account Administrator. The ID will be provided by the FINRA Entitlement Team in the notification email alerting that Account Administrator access has been granted.

<sup>2</sup> See FAQ Q38 on the [CAT NMS Plan](#) website for additional information.

<sup>3</sup> For clearing firms/CAT Reporting Agents, this should be the aggregate total of all accounts with associated LTIDs.



## **2. Designate CAIS Account Administrator(s)**

Access to CAT CAIS leverages the FINRA Entitlement Program that includes the Super Account Administrator (SAA) role for Industry Members and an Account Administrator role for CAT Reporting Agents (Service Providers). Refer to <http://www.finra.org/industry/entitlement-program> for additional information on the FINRA Entitlement Program.

Upon submission and verification of the CAIS registration form, the SAA (for Industry Members) or AA (for Reporting Agents) will be given the ability to grant CAIS access to users. Additionally, they may grant the ability for Account Administrators to manage user access to CAIS.

### 3. Create / Entitle CAT User Accounts for the CAIS Reporter Portal

The SAA and CAT AAs for organizations that have met the prerequisites defined above have the ability to create user accounts and grant entitlement to the CAIS Reporter Portal.

#### 3.1. CAT System Environments

Three environments are available for CAT Reporters to access, as defined below:

Environment	Functionality	Data	Purpose
<b>Industry Test</b>	Functionality that is currently in the development and testing phase and has not yet been released to production.	Data submitted to the Industry Test environment by Industry Members.	User testing of new functionality.
<b>Production Mirror</b>	Full production-equivalent functionality	All data submitted to the Production Mirror environment by Industry Members.	Allows for the submission of data to a production-equivalent environment. This may be used to test code enhancements or corrections prior to providing such data to the production environment.
<b>Production</b>	Full production functionality.	All data submitted to the Production environment by Industry Members.	Provision of production data as required by the CAT NMS plan.

For CAIS Release 1.2, a user account entitled to access the CAIS Reporter Portal with CAT access set to TEST will have access to the CAIS Industry Test and Production Mirror environments. A user account

entitled to access the CAIS Reporter Portal with CAT access set to PROD and with the Reporter LTID Production User role assigned will have access to the CAIS Production Environment.<sup>4</sup> For example, a user with CAIS Reporter Portal entitlement only will be able to access the CAIS Reporter Portal in the Test Environment but not in Production.

For CAIS Release 2.x, a user account entitled to access the CAIS Reporter Portal with CAT access set to TEST will have access to the CAIS Industry Test and Production Mirror Environments. A user account entitled to access the CAIS Reporter Portal with CAT access set to PROD and with either the Reporter LTID Production User role or the Reporter Production User role assigned will have access to the CAIS Production Environment.<sup>5</sup>

### **CAT Super Account Administrators (SAAs)**

The FINRA Entitlement Team will manage environment access for all SAAs. An SAA will be able to manage access to the test environments upon completion of the requirements outlined in §1. When an organization has completed all CAIS testing certification and is granted production access, per §8, the SAA will be given the ability to manage access to the production environment for their users.

### **CAT Account Administrators (AAs) (as Access Managers)**

When creating or modifying an account for an **Account Administrator**, the SAA must indicate if the AA is able to grant and manage access to the test and/or production environments.

### **CAT Users (including Account Administrators)**

When creating or modifying an account for a user, the SAA/AA must indicate if the user is able to access to the test and/or production environments.

**For information on creating and entitling CAT user accounts, see the Industry Member Onboarding Guide at <https://www.catnmsplan.com/registration>.**

Additional tips for managing user and administrator accounts are available in the following guides:

- [Quick Reference Guide for Super Account Administrators](#)
- [FINRA Entitlement Reference Guide](#)

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<sup>4</sup> The user's organization must have access to CAIS Reporter LTID Production User role in order for this role to be assigned.

<sup>5</sup> The user's organization must have access to CAIS Reporter LTID Production User role or the CAIS Reporter Production role in order for these roles to be assigned.

### 3.2. CAIS Reporter Portal User Roles

The following user roles may be assigned to grant users privileges to access and use CAT CAIS.

#### 3.2.1. Entitlements through January 30, 2022

Entitlement	Description	Applies to <u>Test</u> (CT) Environment	Applies to <u>Prod Mirror</u> Environment	Applies to <u>Production</u> Environment
<b>CAIS Reporter</b>	Provides access to the CAIS Reporter Portal. <i>Note: At least one of the privileges below must also be granted for the user to access the application.</i>	Yes	Yes	Yes, when granted the <b>Reporter LTID Production User</b> entitlement
<b>Reporter User</b>	Allows a user to: <ul style="list-style-type: none"> <li>• Create, view, and transmit CAIS records.</li> <li>• Upload files.</li> <li>• View status files.</li> <li>• View and repair errors.</li> <li>• View submission statistics.</li> <li>• Manage reporting relationships/</li> </ul>	Yes	Yes	Yes, when granted the <b>Reporter LTID Production User</b> entitlement
<b>Reporter Read-Only User</b>	Allows the user to: <ul style="list-style-type: none"> <li>• View status files and submission statistics.</li> </ul>	Yes	Yes	Yes, when granted the <b>Reporter LTID Production User</b> entitlement
<b>Reporter LTID Production User</b>	Allows a user to: <ul style="list-style-type: none"> <li>• Access functionality for assigned entitlements as described above in the CAIS LTID Production Environment.</li> </ul> <p>For example, a user with the <b>Reporter User</b> entitlement may create, view, and transmit CAIS records in the Industry Test and Production Mirror Environments. A user with the <b>Reporter User and Reporter LTID Production User</b> entitlements may create, view, and transmit CAIS records in the Industry Test, Production Mirror, and Production Environments.</p>	No	No	Yes

### 3.2.2. Entitlements for January 30, 2022 through April 26, 2022

On or around January 30, 2022, the Full CAIS functionality will be deployed to the Industry Test Environment. Full CAIS functionality will NOT be available in the Prod Mirror or Production Environments; therefore, new entitlements established to support Full CAIS will not be applicable to those environments.

Entitlement	Description	Applies to <u>Test</u> (CT) Environment	Applies to <u>Prod Mirror</u> Environment	Applies to <u>Production</u> Environment
<b>CAIS Reporter</b>	Provides access to the CAIS Reporter Portal. <i>Note: At least one of the privileges below must also be granted for the user to access the application.</i>	Yes	Yes	Yes, when granted the <b>Reporter LTID Production User</b> entitlement
<b>Reporter User</b>	Allows a user to: <ul style="list-style-type: none"> <li>• Create, view, and transmit CAIS records.</li> <li>• Upload files.</li> <li>• View status files.</li> <li>• View and repair errors.</li> <li>• View submission statistics.</li> <li>• Manage reporting relationships/</li> </ul>	Yes	Yes	Yes, when granted the <b>Reporter LTID Production User</b> entitlement
<b>Reporter Read-Only User</b>	Allows the user to: <ul style="list-style-type: none"> <li>• View status files and submission statistics.</li> </ul>	Yes	Yes	Yes, when granted the <b>Reporter LTID Production User</b> entitlement
<b>Reporter LTID Production User</b>	Allows a user to: <ul style="list-style-type: none"> <li>• Access functionality for assigned entitlements as described above in the CAIS LTID Production Environment.</li> </ul> <p>For example, a user with the <b>Reporter User</b> entitlement may create, view, and transmit CAIS records in the Industry Test and Production Mirror Environments. A user with the <b>Reporter User and Reporter LTID Production User</b> entitlements may create, view, and transmit CAIS records in the Industry Test, Production Mirror, and Production Environments.</p>	No	No	Yes
<b>NEW! Reporter Production User</b>	Allows a user to: <ul style="list-style-type: none"> <li>• Access functionality for assigned entitlements as described above in the Full CAIS Production Environment.</li> </ul> <p>For example, a user with the <b>Reporter User</b> entitlement may create, view, and transmit CAIS records in the Industry Test and Production Mirror Environments. A user with the <b>Reporter User and Reporter Production User</b> entitlements may create, view, and transmit CAIS records in the Industry Test, Production Mirror, and Production Environments.</p>	No	No	No

### 3.2.3. Entitlements for April 26, 2022 through July 11, 2022

On or around April 26, 2022, the Full CAIS functionality will be deployed in the Prod Mirror and Production Environments. Entitlements established to support Full CAIS will be applicable to Industry Test, Prod Mirror, and Production Environments. The Reporter LTID Production User will still be available for LTID Phase reporting during this transition period.

Entitlement	Description	Applies to Test (CT) Environment	Applies to Prod Mirror Environment	Applies to Production Environment
<b>CAIS Reporter</b>	Provides access to the CAIS Reporter Portal. <i>Note: At least one of the privileges below must also be granted for the user to access the application.</i>	Yes	Yes	Yes, when granted the <b>Reporter LTID Production User</b> or <b>Reporter Production User</b> entitlements
<b>Reporter User</b>	Allows a user to: <ul style="list-style-type: none"> <li>• Create, view, and transmit CAIS records.</li> <li>• Upload files.</li> <li>• View status files.</li> <li>• View and repair errors.</li> <li>• View submission statistics.</li> <li>• Manage reporting relationships/</li> </ul>	Yes	Yes	Yes, when granted the <b>Reporter LTID Production User</b> or <b>Reporter Production User</b> entitlements
<b>Reporter Read-Only User</b>	Allows the user to: <ul style="list-style-type: none"> <li>• View status files and submission statistics.</li> </ul>	Yes	Yes	Yes, when granted the <b>Reporter LTID Production User</b> or <b>Reporter Production User</b> entitlements
<b>Reporter LTID Production User</b>	Allows a user to: <ul style="list-style-type: none"> <li>• Access functionality for assigned entitlements as described above in the CAIS LTID Production Environment.</li> <li>• <b>Allows submission of files using the LTID Account Phase schema if the user also has the Reporter User entitlement.</b></li> </ul> <p>For example, a user with the <b>Reporter User</b> entitlement may create, view, and transmit CAIS records in the Industry Test and Production Mirror Environments. A user with the <b>Reporter User and Reporter LTID Production User</b> entitlements may create, view, and transmit CAIS records in the Industry Test, Production Mirror, and Production Environments.</p>	No	No	Yes
<b>Reporter Production User</b>	Allows a user to: <ul style="list-style-type: none"> <li>• Access functionality for assigned entitlements as described above in the Full CAIS Production Environment.</li> <li>• <b>Allows submission of files using the LTID Account Phase schema or the Full CAIS Phase schema if the user also has the Reporter User entitlement.</b></li> </ul> <p>For example, a user with the <b>Reporter User</b> entitlement may create, view, and transmit CAIS records in the Industry Test and Production Mirror Environments. A user with the <b>Reporter User and Reporter Production User</b> entitlements may create, view, and transmit CAIS records in the Industry Test, Production Mirror, and Production Environments.</p>	No	No	Yes

## 4. Request CAIS Secure File Transfer Accounts

### 4.1. SFTP Environments

Three environments are available for CAT Reporters to access as described in §3.1 CAT System Environments. When requesting an SFTP account, the SAA must designate the access level on the CAT SFTP Entitlement Form, that is, if the account is for test (including Production Mirror), production, or both. If no access level is marked on the CAT SFTP Entitlement Form, the SFTP account will be given access to both test and production environments. An SAA may submit another CAT SFTP Entitlement Form to update the access level if required.

SFTP accounts for the CAT Reporter may be given access to production only after testing certification has been completed. When the CAT Reporter completes testing certification and is granted access to the production environment, any SFTP account for which production access was designated will be granted production access.

The SAA (for a CAT Reporter) or the Account Administrator (for a CAT Reporting Agent) must submit a CAT SFTP form to request the access be changed for an SFTP account if access should be given to or removed from an existing SFTP account. **When removing SFTP environment access, ensure that the CAT Reporter has at least one remaining SFTP account for the environment.** For example, if the CAT Reporter has only one SFTP account with production access that access should not be removed since it would leave the CAT Reporter without the ability to submit data to the production environment.

### 4.2. CAIS Secure File Transfer Accounts

CAIS Secure File Transfer Protocol (“SFTP”) Accounts enable Industry Members and CAT Reporting Agents to create a machine-to-machine connection to securely transmit data to CAIS and receive related feedback. To create an SFTP account, the organization must first have an SAA or CAT AA established and then submit a CAT SFTP Entitlement Form, available on the CAT NMS Web Site at <https://catnmsplan.com/registration/>. Once the request is verified and processed, the FINRA Entitlement team will send the account credentials to the contact identified on the form. Prior to first use of the SFTP account to submit data, the initial password must be reset by logging into <https://accountmgmt.finra.org/myews/>. Once the password is reset, it will not expire.

CAIS SFTP accounts can be used solely for the machine-to-machine transmission of data to/from CAIS and cannot be used to access any other CAT system. Additionally, existing FINRA FTP accounts cannot be used to submit data to or receive data from CAIS. It is also strongly recommended for each firm to have two separate FTP accounts, one used for the Production environment only and the other used for the Industry Test and Production Mirror environments only.

The following user roles may be assigned to grant machine users privileges to access and use CAT CAIS.

#### 4.2.1. Entitlements through January 30, 2022

Entitlement	Description	Applies to Test (CT) Environment	Applies to Prod Mirror Environment	Applies to Production Environment
<b>CAIS Reporter</b>	Provides access to the CAIS Reporter Portal. <i>Note: At least one of the privileges below must also be granted for the user to access the application.</i>	Yes	Yes	Yes, when granted the <b>Reporter LTID Production User</b> entitlement
<b>SFTP User</b>	Allows a machine user to: <ul style="list-style-type: none"> <li>• Connect to the CAIS SFTP server</li> <li>• Upload files</li> <li>• Retrieve feedback files</li> </ul>	Yes	Yes	Yes, when granted the <b>Reporter LTID Production User</b> entitlement
<b>SFTP Read-Only User</b>	Allows a machine user to: <ul style="list-style-type: none"> <li>• Connect to the CAIS SFTP server</li> <li>• Retrieve feedback files</li> </ul>	Yes	Yes	Yes, when granted the <b>Reporter LTID Production User</b> entitlement
<b>SFTP System Status User</b>	Allows a machine user to: <ul style="list-style-type: none"> <li>• Connect to the CAIS SFTP server</li> </ul>	Yes	Yes	Yes, when granted the <b>Reporter LTID Production User</b> entitlement
<b>Reporter LTID Production User</b>	Allows a user to: <ul style="list-style-type: none"> <li>• Access functionality for assigned entitlements as described above in the CAIS LTID Production Environment.</li> </ul> <p>For example, a user with the <b>SFTP User</b> entitlement may upload CAIS files in the Industry Test and Production Mirror Environments. A user with the <b>SFTP User and Reporter LTID Production User</b> entitlements may upload CAIS files in the Industry Test, Production Mirror, and Production Environments.</p>	No	No	Yes



#### 4.2.2. Entitlements for January 30, 2022 through April 26, 2022

On or around January 30, 2022, the Full CAIS functionality will be deployed to the Industry Test Environment. Full CAIS functionality will NOT be available in the Prod Mirror or Production Environments; therefore, new entitlements established to support Full CAIS will not be applicable to those environments.

Entitlement	Description	Applies to Test (CT) Environment	Applies to Prod Mirror Environment	Applies to Production Environment
<b>CAIS Reporter</b>	Provides access to the CAIS Reporter Portal. <i>Note: At least one of the privileges below must also be granted for the user to access the application.</i>	Yes	Yes	Yes, when granted the <b>Reporter LTID Production User</b> entitlement
<b>SFTP User</b>	Allows a machine user to: <ul style="list-style-type: none"> <li>Connect to the CAIS SFTP server</li> <li>Upload files</li> <li>Retrieve feedback files</li> </ul>	Yes	Yes	Yes, when granted the <b>Reporter LTID Production User</b> entitlement
<b>SFTP Read-Only User</b>	Allows a machine user to: <ul style="list-style-type: none"> <li>Connect to the CAIS SFTP server</li> <li>Retrieve feedback files</li> </ul>	Yes	Yes	Yes, when granted the <b>Reporter LTID Production User</b> entitlement
<b>SFTP System Status User</b>	Allows a machine user to: <ul style="list-style-type: none"> <li>Connect to the CAIS SFTP server</li> </ul>	Yes	Yes	Yes, when granted the <b>Reporter LTID Production User</b> entitlement
<b>Reporter LTID Production User</b>	Allows a user to: <ul style="list-style-type: none"> <li>Access functionality for assigned entitlements as described above in the CAIS LTID Production Environment.</li> </ul> <p>For example, a user with the <b>SFTP User</b> entitlement may upload CAIS files in the Industry Test and Production Mirror Environments. A user with the <b>SFTP User and Reporter LTID Production User</b> entitlements may upload CAIS files in the Industry Test, Production Mirror, and Production Environments.</p>	No	No	Yes
<b>NEW! Reporter Production User</b>	Allows a user to: <ul style="list-style-type: none"> <li>Access functionality for assigned entitlements as described above in the Full CAIS Production Environment.</li> </ul> <p>For example, a user with the <b>SFTP User</b> entitlement may upload CAIS files in the Industry Test and Production Mirror Environments. A user with the <b>SFTP User and Reporter Production User</b> entitlements may upload CAIS files in the Industry Test, Production Mirror, and Production Environments.</p>	No	No	No

### 4.2.3. Entitlements for April 26, 2022 through July 11, 2022

On or around April 26, 2022, the Full CAIS functionality will be deployed in the Prod Mirror and Production Environments. Entitlements established to support Full CAIS will be applicable to Industry Test, Prod Mirror, and Production Environments. The Reporter LTID Production User will still be available for LTID Phase reporting during this transition period.

Entitlement	Description	Applies to Test (CT) Environment	Applies to Prod Mirror Environment	Applies to Production Environment
<b>CAIS Reporter</b>	Provides access to the CAIS Reporter Portal. <i>Note: At least one of the privileges below must also be granted for the user to access the application.</i>	Yes	Yes	Yes, when granted the <b>Reporter LTID Production User</b> or <b>Reporter Production User</b> entitlements
<b>SFTP User</b>	Allows a machine user to: <ul style="list-style-type: none"> <li>Connect to the CAIS SFTP server</li> <li>Upload files</li> <li>Retrieve feedback files</li> </ul>	Yes	Yes	Yes, when granted the <b>Reporter LTID Production User</b> or <b>Reporter Production User</b> entitlements
<b>SFTP Read-Only User</b>	Allows a machine user to: <ul style="list-style-type: none"> <li>Connect to the CAIS SFTP server</li> <li>Retrieve feedback files</li> </ul>	Yes	Yes	Yes, when granted the <b>Reporter LTID Production User</b> or <b>Reporter Production User</b> entitlements
<b>SFTP System Status User</b>	Allows a machine user to: <ul style="list-style-type: none"> <li>Connect to the CAIS SFTP server</li> </ul>	Yes	Yes	Yes, when granted the <b>Reporter LTID Production User</b> or <b>Reporter Production User</b> entitlements
<b>Reporter LTID Production User</b>	Allows a user to: <ul style="list-style-type: none"> <li>Access functionality for assigned entitlements as described above in the CAIS LTID Production Environment.</li> <li><b>Allows submission of files using the LTID Account Phase schema if the user also has the Reporter User entitlement.</b></li> </ul> <p>For example, a user with the <b>SFTP User</b> entitlement may upload CAIS files in the Industry Test and Production Mirror Environments. A user with the <b>SFTP User and Reporter LTID Production User</b> entitlements may upload CAIS files in the Industry Test, Production Mirror, and Production Environments.</p>	No	No	Yes
<b>Reporter Production User</b>	Allows a user to: <ul style="list-style-type: none"> <li>Access functionality for assigned entitlements as described above in the Full CAIS Production Environment.</li> <li><b>Allows submission of files using the LTID Account Phase schema or the Full CAIS Phase schema if the user also has the Reporter User entitlement.</b></li> </ul> <p>For example, a user with the <b>SFTP User</b> entitlement may upload CAIS files in the Industry Test and Production Mirror Environments. A user with the <b>SFTP User and Reporter Production User</b> entitlements may upload CAIS files in the Industry Test, Production Mirror, and Production Environments.</p>	No	No	Yes

## 5. Establish CAIS Reporting Relationships

CAIS Reporting Relationships are required to authorize a Reporting Agent to report and manage CAIS data on behalf of a CAT Reporter. Firms that will not use a Reporting Agent for reporting to CAT CAIS are not required to add Reporting Relationships.

During onboarding, CAIS Reporting Relationships must be entered using the CAIS Reporter Portal in the Industry Test Environment (for Full CAIS certification) or Prod Mirror (for LTID certification). A CAIS Reporting Relationship authorizes an organization (the Reporting Agent or Submitter) to:

- Transmit data to CAIS on behalf of the CAT Reporter.
- View and act on Reporting Feedback and Errors for CAIS data submitted by the Reporting Agent on behalf of the CAT Reporter.
- Receive a copy of the error feedback in their SFTP feedback folder for data submitted on behalf of the CAT Reporter via SFTP.

**For additional information on establishing and maintaining CAIS Reporting Relationships, see the Industry Member [CAT Reporter Portal User Guide](#).**

**CAIS Reporting Relationships must be created and managed in each environment separately. Relationships created in the Test Environment, Production Mirror Environment, and Production Environment will not be ported into another environment. CAIS Reporting Relationships must be independently established in Industry Test, Production Mirror, and/or Production as needed to support the submission of data to the respective environment.**

## 6. Conduct Testing for Production Readiness for LTID Phase

**This section provides instructions for completing testing certification in order to access the CAIS Production Environment for the submission of LTID data only. This section is applicable for Industry Members who are newly required to report LTID information due to a change in LTID status and for small broker-dealers who are required to report LTID information as of December 13, 2021.**

**For CAT Reporters that are already reporting LTID information in the CAIS Production Environment, see the next section for information on testing certification for the submission of Full CAIS customer and account data.**

Industry Members and CAT Reporting Agents are required to perform testing to demonstrate their ability to successfully submit LTID data to CAIS prior to accessing the CAIS production environment. Testing for LTID submission is performed in the CAIS Production Mirror Environment. CAT Reporters have no volume limitation and may submit full production-equivalent loads to the Production Mirror Environment. All submission and feedback processes mirror those of the Production Environment.

Testing certification must be completed prior to submitting LTID data to the CAIS production environment. Additionally, LTID certification is separate from the Full CAIS certification process described in the next section. Any reporter that has completed LTID certification and has been given access to production may continue to submit LTID data files, regardless of its Full CAIS certification status until such point in time that Full CAIS reporting is required.

### 6.1. CAIS LTID Production Readiness Requirements for Self-Reporting Firms

Firms that will report to CAIS on their own behalf must complete the following steps:

**Step 1:** Successfully connect to SFTP and/or login to the CAIS Reporter Portal Production Mirror Environment.

**Step 2:** Determine the required certification level.

Each entity is held to a specific certification level based on the approximate number of accounts with associated LTIDs, as identified during the CAIS registration process.

For **reporters with fewer than 100 accounts with LTID associations**, all accounts should be submitted for certification using production data.

For **reporters with 100 or more accounts with LTID associations**, at least 100 accounts should be submitted for certification using production data.

**Step 3:** Successfully submit production data, per the required certification level identified in Step 2, with an error rate of less than 10%. Record the corresponding CAT processing date(s).

**Step 4:** Upon completion, contact the FINRA CAT Helpdesk as outlined in §8.

## **6.2. CAIS LTID Production Readiness Requirements for Clearing Firms and CAT Reporting Agents**

CAT Reporters and CAT Reporting Agents that will report to CAIS on behalf of another firm must complete the following steps:

**Step 1:** Successfully connect to SFTP and/or login to the CAIS Reporter Portal Production Mirror Environment. This must be completed by both the CAT Reporter and the clearing firm/CAT Reporting Agent.

**Step 2:** Establish CAIS Reporting Relationships in the Production Mirror Environment as applicable, per §5. This must be completed by the CAT Reporter. These relationships are applicable to the Production Mirror Environment only. CAIS Reporting Relationships must be established separately in Production once access has been granted.

**Step 3:** Determine the required certification level.

Each entity is held to a specific certification level based on the approximate number of accounts with associated LTIDs, as identified during the CAIS registration process.

For **reporters with fewer than 100 accounts with LTID associations**, all accounts should be submitted for certification using production data.

For **reporters with 100 or more accounts with LTID associations**, at least 100 accounts should be submitted for certification using production data.

**Clearing firms and CAT Reporting Agents should use the aggregate total of all accounts with associated LTIDs to determine their required certification level. Additionally, at least one account must be provided for each firm for which they report.**

**Step 4:** Successfully submit production data, per the required certification level identified in Step 3, with an error rate of less than 10%. Record the corresponding CAT processing date(s).

**Step 5:** Upon completion, contact the FINRA CAT Helpdesk as outlined in §8.

### **6.3. CAIS LTID Production Readiness Requirements for Industry Members Submitting via CAT Reporting Agents**

CAT Reporters that will report to CAIS using a Reporting Agent must perform the following:

**Step 1:** Successfully login to the CAIS Reporter Portal Production Mirror Environment.

**Step 2:** Establish CAIS Reporting Relationships in the Production Mirror Environment as applicable, per §5. These relationships are applicable to the Production Mirror Environment only. CAIS Reporting Relationships must be established separately in Production once access has been granted.

**Step 3:** When the Industry Member's CRA has successfully certified on behalf of the Industry Member, contact the FINRA CAT Helpdesk as outlined in §8.

The Industry Member will need to confirm that all of its CAT Reporting Agents have certified for CAIS production reporting.

### **6.4. CAIS LTID Production Readiness Requirements for Firms that Do Not Have Accounts with LTID Associations**

Reporters that are have no accounts with associated LTIDs to report at this time are still encouraged to complete the testing certification process in order to quickly and efficiently onboard in the future if and when necessary.

Firms with no accounts with LTID associations that wish to complete testing certification must complete the following steps:

**Step 1:** Successfully connect to SFTP and/or login to the CAIS Reporter Portal Production Mirror Environment. This must be completed by both the CAT Reporter and the clearing firm/CAT Reporting Agent (if applicable).

**Step 2:** Establish CAIS Reporting Relationships in the Production Mirror Environment as applicable, per §5, if applicable. This must be completed by the CAT Reporter. These relationships are applicable to the

Production Mirror Environment only. CAIS Reporting Relationships must be established separately in Production once access has been granted.

**Step 3:** Successfully submit mock data to demonstrate the ability to successfully format data for and transmit data to the CAIS system. Record the corresponding CAT processing date(s).

**Step 4:** Upon completion, contact the FINRA CAT Helpdesk as outlined in §8.

## **7. Conduct Testing for Production Readiness for Full CAIS Reporting**

**Testing certification begins in February 2022 and must be completed no later than June 20, 2022 in order to be granted access to the Production Environment by the compliance go-live date of July 11, 2022.**

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. Production readiness testing is limited to the validations in effect when an Industry Member is required to begin reporting data to Full CAIS. 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 CAIS production environment.**



## 7.1. CAIS Full Production Readiness Requirements for Self-Reporting Firms

Firms that will report to CAIS on their own behalf must complete the following steps:

**Step 1:** Successfully connect to SFTP and/or login to the CAIS Reporter Portal Test Environment.

**Step 2:** Determine the required certification level.

### Required FDID Records Submission

All Reporters must provide production data for at least 75% of the FDID population or 1,000 records, whichever is fewer. For example:

# of FDIDs	75% of FDIDs	Minimum # of FDIDs for Production Certification
500	375	375
1000	750	750
1500	1125	1000
2500	1875	1000
4800	3600	1000

### Required CAT Customer Records Submission

**All** CAT Customer record(s) corresponding to the submitted FDID records must be provided. For example, a joint account with two account holders and an authorized trader (e.g., power of attorney) would be submitted as one FDID record with three associated Customer records.

### Required TID Types Submission

The CAT Customer records for the submitted FDID records must include at least one of each TID Type that is applicable for the CAT Reporter, including:

- SSN/ITIN for a US Natural Person
- EIN for a US Legal Entity
- FOREIGN for a non-US Natural Person or Legal Entity

For example, a CAT Reporter that does business with only US Natural Persons Customers must submit at least one SSN/ITIN TID Type; however, it would not report any EIN or FOREIGN TID Types since it does not have any of these customer types. A CAT Reporter that has US Natural Persons,

US legal entity, and foreign Customers must report at least one SSN/ITIN, one EIN, and one FOREIGN TID Type.

**Step 3:** Successfully submit production data, per the required certification level identified in Step 2, with an error rate of less than 15%. Record the corresponding CAT processing date(s).

**Step 4:** Upon completion, contact the FINRA CAT Helpdesk as outlined in §8.

## 7.2. CAIS Full Production Readiness Requirements for Clearing Firms and CAT Reporting Agents

CAT Reporters and CAT Reporting Agents that will report to CAIS on behalf of another firm must complete the following steps:

**Step 1:** Successfully connect to SFTP and/or login to the CAIS Reporter Portal Test Environment. This must be completed by both the CAT Reporter and the clearing firm/CAT Reporting Agent.

**Step 2:** Establish CAIS Reporting Relationships in the Test Environment as applicable, per §5. This must be completed by the CAT Reporter. These relationships are applicable to the Test Environment only. CAIS Reporting Relationships must be established separately in Production once access has been granted. **CAIS Reporting Relationships established for LTID reporting do not need to be re-established.**

**Step 3:** Determine the required certification level.

### Required FDID Records Submission

All Clearing Firms and CAT Reporting Agents must provide production data for at least 75% of the FDID population (aggregated across all CAT Reporters for which organization submits data) or 1,000 records, whichever is fewer. For example:

Total # of FDIDs	75% of FDIDs	Minimum # of FDIDs for Production Certification
500	375	375
1000	750	750
1500	1125	1000
2500	1875	1000
4800	3600	1000

Clearing Firms and CAT Reporting Agents (CRAs) that submit on behalf of multiple CAT Reporters may provide FDIDs from any combination of CAT Reporters. Consider a CRA that submits on behalf of CAT Reporters A, B, C, and D, each of which have 1200 FDIDs, for a total of 4800 FDIDs. The CRA can submit the required 1000 FDIDs in any combination across the four CAT Reporters, such as:

- 1000 FDIDs from A and zero FDIDs from B, C, and D
- 500 each from A and C, zero from B and D
- 333 from each of A and B, 334 from C, zero from D
- 250 each from A, B, C, and D.

### **Required CAT Customer Records Submission**

**All** CAT Customer record(s) corresponding to the submitted FDID records must be provided. For example, a joint account with two account holders and an authorized trader (e.g., power of attorney) would be submitted as one FDID record with three associated Customer records.

### **Required TID Types Submission**

The CAT Customer records for the submitted FDID records must include at least one of each TID Type where the Clearing Firm or CRA reports on behalf of a CAT Reporter that has at least one CAT Customer with that TID Type, including:

- SSN/ITIN for a US Natural Person
- EIN for a US Legal Entity
- FOREIGN for a non-US Natural Person or Legal Entity

For example, a CRA that submits data only for CAT Reporters that exclusively do business with US Natural Persons Customers must submit the SSN/ITIN TID Type; however, it would not report any EIN or FOREIGN TID Types since it does not have any of these customer types. A CRA that submits data for a CAT Reporter that has US Natural Persons, US Legal Entities, and foreign Customers must report at least one SSN/ITIN, one EIN, and one FOREIGN TID Type.

**Step 4:** Successfully submit production data, per the required certification level identified in Step 3, with an error rate of less than 15%. Record the corresponding CAT processing date(s).

**Step 5:** Upon completion, contact the FINRA CAT Helpdesk as outlined in §8.

### 7.3. CAIS Full Production Readiness Requirements for Industry Members Submitting via CAT Reporting Agents

CAT Reporters that will report to CAIS using a Reporting Agent must perform the following:

**Step 1:** Successfully login to the CAIS Reporter Portal Test Environment.

**Step 2:** Establish CAIS Reporting Relationships in the Test Environment as applicable, per §5. These relationships are applicable to the Test Environment only. CAIS Reporting Relationships must be established separately in Production once access has been granted. **CAIS Reporting Relationships established for LTID reporting do not need to be re-established.**

**Step 3:** When the Industry Member's CRA has successfully certified on behalf of the Industry Member, contact the FINRA CAT Helpdesk as outlined in §8.

The Industry Member will need to confirm that all of its CAT Reporting Agents have certified for CAIS production reporting.

### 7.4. CAIS Full Production Readiness Requirements for Firms that Do Not Have Production FDIDs

Reporters that are have no FDIDs to report at this time are still encouraged to complete the testing certification process in order to quickly and efficiently onboard in the future if and when necessary. Firms with no FDIDs that wish to complete testing certification must complete the following steps:

**Step 1:** Successfully connect to SFTP and/or login to the CAIS Reporter Portal Test Environment. This must be completed by both the CAT Reporter and the clearing firm/CAT Reporting Agent (if applicable).

**Step 2:** Establish CAIS Reporting Relationships in the Test Environment per §5, if applicable. This must be completed by the CAT Reporter. These relationships are applicable to the Test Environment only. CAIS Reporting Relationships must be established separately in Production once access has been granted. **CAIS Reporting Relationships established for LTID reporting do not need to be re-established.**

**Step 3:** Successfully submit mock data to demonstrate the ability to successfully format data for and transmit data to the CAIS system. Record the corresponding CAT processing date(s). See Section 7.1 (for self-reporting firms) or Section 7.2 (for Clearing Firms and CAT Reporting Agents) for additional details on the requirements for submission of FDID records, Customer records, and TID Types.

**Step 4:** Upon completion, contact the FINRA CAT Helpdesk as outlined in §8.

## 8. Certify Testing Completion

Once CAT Reporters have completed all onboarding steps, including the successful completion of production readiness testing, each IM and CRA must contact the FINRA CAT Help Desk at 888-696-3348 or [help@finracat.com](mailto:help@finracat.com). The FINRA CAT Help Desk will require the Processing Date(s) on which the testing occurred.

Upon verification of the Onboarding Steps by FINRA CAT, CAT Reporters will be granted access to the CAIS Production Environment and a notification confirming access will be sent.

**CAIS Reporting Relationships must be created and managed in each environment separately. Relationships created in the Test Environment, Production Mirror Environment, and Production Environment will not be ported into another environment. CAIS Reporting Relationships must be independently established in Industry Test, Production Mirror, and/or Production as needed to support the submission of data to the respective environment.**