

Interim Reporting Obligation 4 and Full CAIS Go-Live

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1. Revisions Summary

Version	Publish Date	Description
1.0	8/2/2023	Initial publication.

2. Summary

This CAT Alert announces new Interim Reporting Obligation 4 and Full CAIS Compliance Go-Live dates for Industry Members.

[CAT Alert 2022-01](#) described a delay in the Full CAIS compliance date to a date to be determined, no earlier than the second half of 2023. As previously described, FINRA CAT will implement a series of releases to address certain outstanding CAIS system issues that impact Industry Members’ ability to comply fully with the CAIS error correction requirements.

This CAT Alert establishes the following compliance dates:

Interim Reporting Obligation 4: May 24, 2024

Full CAIS Compliance: May 31, 2024

FINRA CAT will complete the necessary releases to remediate the CAIS system issues well in advance of the May 2024 compliance dates to allow Industry Members ample time to address outstanding errors ahead of the compliance deadlines.

3. Introduction

As set forth in [CAT Alert 2022-01](#), an implementation schedule with four interim reporting obligations was established and it was designed to enable Industry Members time to observe feedback in the Production Environment with smaller data sets prior to Full CAIS submissions, including time to resolve errors and implement operational processes to meet the T+3 error correction timeframe. The implementation schedule also allows time for CAIS performance enhancements to increase system capacity and ensure the feedback times set forth in Table 16 of the [CAT Reporting Customer and Account Technical Specifications for Industry Members-Full CAIS](#) are met.

Industry Members are reminded that submission of all reportable FDID and Customer data, including daily changes and additions, has been required since November 7, 2022.

4. Full CAIS Implementation Schedule

Table 1 shows the key dates for Full CAIS reporting requirements, including the new dates for Interim Reporting Obligation 4 and Full CAIS Compliance Go-Live.

Table 1:

Requirement	Deadlines
<p>Production Certification Deadline</p> <p>All Industry Members and CAT Reporting agents were required to complete testing certification as specified in the Industry Member CAIS Onboarding Guide.</p>	<p>July 25, 2022</p>
<p>Interim Reporting Obligation 1: CAT Submitters – Partial Submissions</p> <p>For a single date within the range specified, were required to complete a scheduled partial submission to the Production Environment in Full CAIS Format.</p> <p>FINRA CAT began contacting CAT Submitters on August 1, 2022 to schedule their respective specific reporting dates.</p>	<p>August 15 – September 15, 2022</p>
<p>Interim Reporting Obligation 2: All Industry Members – Submission of all FDIDs and Customers</p>	<p>October 10 – October 31, 2022</p>

For a single date within the range specified, were required to complete a scheduled submission of the FDID Population with CAT-reportable activity between June 12, 2022 and September 30, 2022 to the Production Environment in Full CAIS Format.	
<p>Interim Reporting Obligation 3: All Industry Members – Daily Reporting of FDID and Customer Data</p> <p>All Industry Members were required to begin daily reporting of FDID Records and changes/additions for all CAT-reportable activity beginning June 12, 2022 through at least September 30, 2022. Corrections to reported data are not required until the subsequent step.</p>	November 7, 2022
<p>Interim Reporting Obligation 4: All Industry Members – Error Repairs</p> <p>All outstanding rejections and Material Inconsistencies for all CAT-reportable activity beginning June 12, 2022 are resolved.</p>	May 24, 2024
<p>Full CAIS Compliance Go-Live</p> <p>All error repair and Material Inconsistency resolution deadlines are enforced.</p>	May 31, 2024

4.1. Interim Reporting Obligation 4: Repair all Outstanding Rejections and Resolve all Outstanding Material Inconsistencies

Schedule Date: May 24, 2024.

By Interim Reporting Obligation 4, all Industry Members should have reported to the Production Environment in Full CAIS Phase format all Active Accounts¹ and be reporting all new FDID Records to the Production Environment by the Plan-established deadline and reporting all changes and additions to FDID Records for Active Accounts that were previously accepted by CAIS by the Plan-established deadline.

By May 24, 2024, all Industry Members must have:

¹ Section 1.1 of the CAT NMS Plan defines “Active Accounts” as “an account that has had activity in Eligible Securities within the last six months.” This includes all FDIDs with any CAT-reportable activity on or after June 12, 2022.

- Repaired all outstanding rejections for Active Accounts for Full CAIS Phase format submissions to the Production Environment; and
- Resolved all outstanding Material Inconsistencies for Customer Records associated to Active Accounts for submissions to the Production Environment.

At the time of Interim Reporting Obligation 4, Industry Members are required to repair any rejections and resolve any Material Inconsistencies but not within the Plan-established deadlines. The requirements to do so within the timeframes of the Plan-established deadlines will become effective with the Full CAIS Compliance Go-Live date of May 31, 2024. However, Industry Members and CAT Reporting Agents that are prepared to support rejection repair and Material Inconsistency resolution by the Plan-established deadlines may do so at any time.

Note: Industry Members who submitted dormant or inactive accounts (i.e., FDIDs with no CAT-reportable activity on or after June 12, 2022) to the Production Environment in Full CAIS Phase format and subsequently received rejections or Material Inconsistencies are not required to repair or resolve them. However, rejections and Material Inconsistencies on dormant or inactive accounts cannot be removed from the compliance error rate and therefore unrepaired rejections and unresolved Material Inconsistencies will be included in the compliance error rate. Please also note that there will be no CAIS Report Cards issued until at least one full calendar month following the Full CAIS Compliance Go-live date of May 31, 2024.

4.2. Full CAIS Compliance Go-Live

Schedule Date: May 31, 2024.

The following is a summary of the Full CAIS reporting requirements effective at Go-Live:

- Reporting of all FDID Records with CAT-reportable activity as of June 12, 2022;
- Reporting of all new FDID Records for Active Accounts to the Production Environment by 8:00 a.m. Eastern Time on the following CAT Trading Day;
- Reporting of all changes and additions to FDID Records for Active Accounts previously accepted by CAIS by 8:00 a.m. Eastern Time on the following CAT Trading Day;
- Repair of all rejections by 5:00 p.m. Eastern Time on the third Trading Day after the Customer or Account information became available to the Industry Member; and
- Resolution of all Material Inconsistencies by the deadline described in the [CAT Reporting Customer and Account Technical Specifications for Industry Members-Full CAIS](#):
 - For Triggering Firms: by 5:00 p.m. Eastern Time on the third CAT Trading Day after the Customer or Account information became available to the Industry Member
 - For Impacted Firms: by 5:00 p.m. Eastern Time on the third CAT Trading Day after the inconsistency was identified.

5. System Performance

To address open issues impacting Industry Member feedback and tools, FINRA CAT will implement a series of releases. These releases will be announced prior to the Test and Production Environment deployments, along with the specific issues that are being addressed by each release. The implementation schedule set forth in this CAT Alert is designed to ensure Industry Members are able to submit required data and generally receive feedback within the timeframes set forth in Table 16 of the [CAT Reporting Customer and Account Technical Specifications for Industry Members-Full CAIS](#). Industry Members that begin submitting data earlier than is set forth in the implementation schedule, may not receive feedback consistently within the timeframes set forth in Table 16 of the [CAT Reporting Customer and Account Technical Specifications for Industry Members-Full CAIS](#). The new Interim Reporting Obligation 4 compliance date is sufficiently after these releases. FINRA CAT plans to provide Industry Members with a complete list of outstanding errors by April 8, 2024 (ahead of the May 24, 2024 Interim Reporting Obligation 4 date when all outstanding errors must be repaired).

Performance enhancements are released in the Test Environment and Production Environment per the [Full CAIS Industry Member Release Rollout](#), which is updated as releases are scheduled.

6. Resources

- [CAT Reporting Customer and Account Technical Specifications for Industry Members-Full CAIS](#)
- [Full CAIS Schemas](#)
- [CAT Alert – 2022-01- Full CAIS Reporting Timeline and Interim Reporting Obligations](#)
- [CAT Alert – 2021-04- Phase 2e: Transitioning from LTID Account Phase to Full CAIS Phase](#)
- Recordings and presentations from [CAIS Industry Testing Checkpoint Calls](#)