Consolidated Audit Trail

Part 2: CAIS Releases Industry Webinar

December 6, 2023

CAIS Releases Industry Webinar: Part 1 Review and Updates

Scope of Part 1

- Part 1 of the CAIS Releases webinar was held on November 29, 2023 and provided a high-level overview of the data load issues and planned releases in support of the May 2024 CAIS compliance deadlines, including:
 - What Industry Members can expect before, during and after each release
 - New schemas for the (1) <u>Outstanding Rejections Feedback File</u>; and (2) <u>Material</u> <u>Inconsistencies Feedback File</u> (metadata and data file pair)
 - Details regarding the expansion of the correctionList to use a correctionAction of 'DELETE' for all Data Validation Errors
 - FDID validations in the Transaction system.

CAIS Releases Webinar: Part 1 Updates

- An updated CAIS Technical Specification will be scheduled for publication in December 2023.
- Daily delivery of Outstanding Rejections Feedback Files
 - Release dates are TBD ~ January 2024 for testing and ~ February 2024 for Production

Additional Resources:

- FINRA CAT will deliver a one-time list of FDIDs that were accepted to the Transaction Production Environment on events with an event date on or after June 12, 2022 (through the list delivery date) that are not in the CAIS Production Environment.
 - The release date is TBD ~ February 2024
- FINRA CAT will also provide, upon request, a one-time list of FDIDs that were accepted in the CAIS Production Environment since April 24, 2022 and the associated status.
 - Requests can begin in February 2024

CAIS Releases Industry Webinar: Part 2 and Agenda

Scope of Part 2 and Agenda

- Today's webinar will focus on Material Inconsistencies:
 - Material Inconsistencies Refresher
 - Summary of Changes
 - Timeline for Re-enabling Material Inconsistencies
 - Establishing Inconsistent Customer Data Post-Reload
 - Material Inconsistencies Identification Simplified Approach
 - Material Inconsistencies Resolution Simplified Approach
 - Intra-firm and Inter-firm Examples (One-time & Daily)
 - Feedback and Resolution Availability
 - Outstanding Material Inconsistencies Schemas
 - Updates to CAIS Reporter Portal Screens

Material Inconsistencies Refresher

Material Inconsistencies Refresher

- Material Inconsistencies are identified by CAT when FDID Records have passed validation checks (i.e., no errors were identified by CAT), but inconsistency scans have found inconsistent Customer data.
 - There is feedback associated with Material Inconsistencies and Industry Members that receive Material Inconsistency notifications must take action to resolve them.
- Material Inconsistencies are generated when:
 - The Transformed Identifier value (*tidValue*) is the same but:
 - A different Year Of Birth was reported (Natural Person Customers); or
 - A different EIN was reported (Legal Entity Customers); or
 - For foreign Customers, the same combination of foreignTIDType (specifically, the 'OTHGOVT' or 'NATIONALID' values), foreignTIDCountryCd, and tidValue was submitted as both a Natural Person and Legal Entity.
- Material Inconsistencies can occur when:
 - The same Industry Member submits inconsistent Customer information across multiple files ("intra-firm inconsistencies")
 - The same Industry Member submits inconsistent Customer information across multiple correspondents ("inter-firm inconsistencies")
 - Two or more Industry Members submit Customer information that is inconsistent across Industry Members ("interfirm inconsistencies").

Material Inconsistencies – Summary of Changes

 Single Outstanding Material Inconsistencies feedback file delivered daily by 5 pm ET For inconsistencies across Industry Members (inter-firm): Feedback delivered to all affected Industry Members Move to one-time confirmation of Customer information New feedback file format (Meta and Data file) Sentinel file to all Industry Members upon process completion Additional Inconsistency Codes to distinguish inconsistencies within an Industry Member (intra-firm) and across Industry Members/correspondents (inter-firm) Updates to CAIS Reporter Portal, including Material Inconsistencies statistics on a daily basis (Timely and Late Resolution) Empty feedback file for Triggered Inconsistencies will no longer be delivered Eliminate Impacted Inconsistencies by delivering feedback to all affected Industry Members 365-day "grace period" for inconsistencies across Industry Members will be replaced with a one-time confirmation updateNotification rejections (Error Codes 22503 and 22525) will be retired 	What is coming?	What is going away?
 Feedback delivered to all affected Industry Members Move to <u>one-time confirmation</u> of Customer information New feedback file format (Meta and Data file) Sentinel file to all Industry Members upon process completion Additional Inconsistency Codes to distinguish inconsistencies within an Industry Member (intra-firm) and across Industry Members/correspondents (inter-firm) Updates to CAIS Reporter Portal, including Material Inconsistencies statistics on a daily basis (Timely and Late affected Industry Members 365-day "grace period" for inconsistencies across Industry Members will be replaced with a <u>one-time confirmation</u> updateNotification rejections (Error Codes 22503 and 22525) will be retired 		
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Simplified Material Inconsistencies Procedure

Re-Enabling Material Inconsistencies Timeline

1/22/2023

Material Inconsistencies checks disabled

11/30/2023

Publish new Material Inconsistencies Feedback File schema TBD ~ Jan 2024 Test

TBD ~ Feb 2024 Prod

Re-enable Material Inconsistencies and deliver feedback in the new schema By 5/24/2024

Interim Reporting
Obligation 4

Resolve all Material
Inconsistencies for
Customers associated to
Active Accounts
submitted to Production
Environment

Effective 5/31/2024

Full CAIS Compliance

Resolve Material Inconsistencies by 5 pm ET on T+3

Establishing Inconsistent Customer Data Post-Reload

- Material Inconsistencies generated between the April 24, 2022 (Production open date) and January 22, 2023 (date Material Inconsistencies were disabled) will be eliminated
 - Industry Members will not be responsible for resolving them and they will not be included in any future compliance statistics.
- After the historical reload completes, a one-time historical scan of Customer Records accepted since April 24, 2022 will be performed to identify Customers with an association to an active FDID having Customer data that is inconsistent.
- Material Inconsistencies identified will be delivered to all Industry Members, including for Customers that are outside of the 365-day grace period.
- Feedback will be delivered in a new schema, which will also be leveraged for daily feedback.

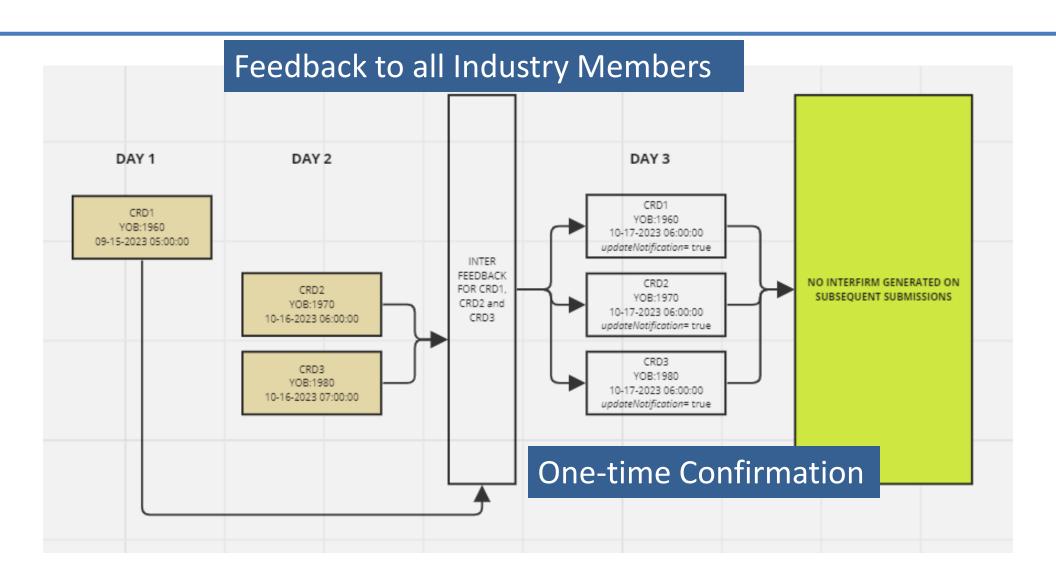
Material Inconsistency Identification - Simplified Approach

- Intra-firm Inconsistency Checks: All Customers accepted in CAIS will be checked for instances where the same Industry Member has submitted a different yearOfBirth/ein/Customer RecordType value for the same Customer since the Customer was last accepted with updateNotification= true.
- Inter-firm Inconsistency Checks: All Customers accepted in CAIS will be checked for instances where different Industry Members have submitted a different yearOfBirth/ein/Customer Record Type value in their most recent accepted submission.
- Material Inconsistencies will only be created for Customers with an association to an active FDID where an outstanding inconsistency does not already exist.

Material Inconsistency Resolution - Simplified Approach

- ▶ Industry Members will continue to use *updateNotification* = true for resolving open inconsistencies and proactive updates.
- When updateNotification = true is used to resolve an open Material Inconsistency, this will be used as the one-time confirmation/update and Industry Members will no longer receive an inter-firm inconsistency on the Customer.
 - This guidance does not apply to intra-firm inconsistencies.
- When updateNotification = true is used for proactive updates, properly formatted records will be accepted rather than rejected (Error Codes 22503 and 22525 will be retired).

Material Inconsistency Feedback & One-Time Confirmation Process Flow



Material Inconsistencies: One-Time Historical Scan Examples

One-Time Scan Example: Intra-Firm Inconsistency

Submission Sequence	Submission Timestamp	CAT Reporter CRD	Natural Person	YOB	updateNotification	Result of Inconsistency Scan
1	02-01-2023 05:00:00	CRD1	John Smith	1950	True	Most recent use of <i>updateNotification</i> .
2	04-10-2023 06:00:00	CRD1	John Smith	1970	False	
3	05-20-2023 04:00:00	CRD1	John Smith	1970	False	
4	09-15-2023 05:00:00	CRD1	John Smith	1950	False	During the one-time scan, a Material Inconsistency will be created for this submission since the Customer has an inconsistent YOB within the Industry Member since the most recent use of updateNotification= 'true'.
5	04-01-2024* 06:00:00	CRD1	John Smith	1950	True	Resolves the Material Inconsistency.

^{*}Date is for illustration purposes only.

One-Time Scan Example: No Intra-Firm Inconsistency

Submission Sequence	Submission Timestamp	CAT Reporter CRD	Natural Person	YOB	updateNotification	Result of Inconsistency Scan
1	02-01-2023 05:00:00	CRD1	John Smith	1950	False	
2	04-10-2023 06:00:00	CRD1	John Smith	1900	False	
3	05-20-2023 04:00:00	CRD1	John Smith	1970	True	Most recent use of <i>updateNotification</i> .
4	09-15-2023 05:00:00	CRD1	John Smith	1970	False	During the one-time scan, no Material Inconsistency will be created since the Customer has a consistent YOB within the Industry Member since the most recent use of <i>updateNotification</i> = 'true'.

One-Time Scan Example: Inter-Firm Inconsistency

Submission Sequence	Submission Timestamp	CAT Reporter CRD	Natural Person	YOB	updateNotification	Result of Inconsistency Scan
1	11-15-2022 05:00:00	CRD1	John Smith	1970	True	 This Customer is outside of the 365-day grace period A Material Inconsistency will be created for this submission.
2	11-20-2023 06:00:00	CRD4	John Smith	1950	True	A Material Inconsistency will be created for this submission.
3	04-01-2024* 05:00:00	CRD1	John Smith	1970	True	Resolves the Material Inconsistency for CRD1 and CRD1 will never again receive an inter-firm Material Inconsistency for this Customer Record.
4	04-15-2024* 06:00:00	CRD4	John Smith	1950	True	Resolves the Material Inconsistency for CRD4 and CRD4 will never again receive an inter-firm Material Inconsistency for this Customer Record.

^{*}Date is for illustration purposes only.

One-Time Scan Example: No Inter-Firm Inconsistency

Submission Sequence	Submission Timestamp	CAT Reporter CRD	Natural Person	YOB	updateNotification	Result of Inconsistency Scan
1	04-15-2023 05:00:00	CRD1	John Smith	1970	False	
2	05-01-2023 05:00:00	CRD1	John Smith	1900	False	
3	11-20-2023 06:00:00	CRD1	John Smith	1950	True	During the one-time scan, no Material Inconsistency will be generated since the Customer has a consistent YOB across Industry Members (inter-firm).
4	12-01-2023 05:00:00	CRD4	John Smith	1950	False	During the one-time scan, no Material Inconsistency will be generated since the Customer has a consistent YOB across Industry Members (inter-firm).

One-Time Scan Example: Clearing Firm with Correspondents

Submission Sequence	Submission Timestamp	CAT Reporter CRD	Correspondent CRD	Natural Person	YOB	updateNotification	Result of Inconsistency Scan
1	04-10-2023 05:00:00	CRD1		John Smith	1950	True	During the one-time scan, an inter-firm Material Inconsistency
2	04-10-2023 05:10:00	CRD1	456	John Smith	1970	False	will be created against each submission because the YOB is inconsistent across CRD1 and its
3	04-10-2023 05:20:00	CRD1	987	John Smith	1970	True	correspondents.
4	04-10-2023 05:30:00	CRD1	9999	John Smith	1970	False	
5	05-10-2024* 05:00:00	CRD1		John Smith	1970	True	Four separate submissions (one for the clearing firm and one for
6	05-15-2024* 05:10:00	CRD1	456	John Smith	1970	True	each of the three correspondents) are required to resolve the Material
7	05-15-2024* 05:20:00	CRD1	987	John Smith	1970	True	Inconsistencies. CRD1 will never again receive an
8	05-15-2024* 05:30:00	CRD1	9999	John Smith	1970	True	inter-firm Material Inconsistency when reporting this Customer for itself and when reporting correspondentCRD = 456, 987 and 9999.

^{*}Date is for illustration purposes only.

Material Inconsistency: Daily Scan Examples

Daily Scan Example: Intra-Firm Inconsistency No Open Material Inconsistencies Exist

ubmission Sequence	Submission Timestamp	CAT Reporter CRD	Natural Person	YOB	updateNotification	Result of Inconsistency Scan
1	05-20-2024 04:00:00	CRD1	John Smith	1970	False	
2	05-20-2024 06:00:00	CRD1	John Smith	1950	False	During the once-daily scan, a Material Inconsistency will be created for this submission with Inconsistency Code 30002 (Inconsistent data for <i>yearOfBirth</i> within the Industry Member).
3	05-21-2024 06:00:00	CRD1	John Smith	1970	True	Resolves the Material Inconsistency.

Daily Scan Example: Inter-Firm Inconsistency Open Material Inconsistency Exists

Submission Sequence	Submission Timestamp	CAT Reporter CRD	Natural Person	YOB	updateNotification	Result of Inconsistency Scan
1	05-20-2024 05:00:00	CRD1	John Smith	1970	False	New Inconsistency Code 40002 (Inter-firm inconsistency)
2	05-20-2024 06:00:00	CRD2	John Smith	1950	False	New Inconsistency Code 40002 (Inter-firm inconsistency)
3	05-21-2024 05:00:00	CRD1	John Smith	1970	False	This Customer Record is accepted because Error Code 22525 is retired but the Material Inconsistency will remain outstanding.
4	05-21-2024 06:00:00	CRD2	John Smith	1950	True	Resolves the Material Inconsistency for CRD2 and the one-time confirmation means that CRD2 will never again receive an inter-firm Material Inconsistency for this Customer Record.

Daily Scan Example: Inter-Firm Inconsistency Across Days and Across Industry Members

Submission Sequence	Submission Timestamp	CAT Reporter CRD	Natural Person	YOB	updateNotification	Result of Inconsistency Scan
1	05-19-2024 05:00:00	CRD1	John Smith	1970	False	This Customer is not inconsistent with any other Customer Records; therefore, no Material Inconsistency is created.
2	05-20-2024 06:00:00	CRD2	John Smith	1950	False	During the once-daily scan, Material Inconsistencies will be created for CRD1 and CRD2 with Inconsistency Code 40002 (Inconsistent data for <i>yearOfBirth</i> across Industry Members, or within a single clearing firm across correspondents).
3	05-21-2024 06:00:00	CRD3	John Smith	1980	False	 During the once-daily scan, a Material Inconsistency will be created for CRD3 with Inconsistency Code 40002. No new Material Inconsistency will be created for CRD1 and CRD2 since their versions of this Customer already has an outstanding Material Inconsistency.
4	05-21-2024 17:00:00	CRD1	John Smith	1970	True	Resolves the Material Inconsistency and one-time confirmation means that CRD1 will never again receive an inter-firm Material Inconsistency for this Customer Record.
5	05-22-2024 16:00:00	CRD2	John Smith	1950	True	Resolves the Material Inconsistency and one-time confirmation means that CRD2 will never again receive an inter-firm Material Inconsistency for this Customer Record.
6	05-23-2024 06:00:00	CRD3	John Smith	1980	True	Resolves the Material Inconsistency and one-time confirmation means that CRD3 will never again receive an inter-firm Material Inconsistency for this Customer Record.

Feedback and Resolution Availability

- All Customer Records accepted in CAIS will be included in the daily scan with feedback delivered to all Industry Members having a version of the Customer associated to an active FDID.
- Data submitted by 8 am ET and accepted in CAIS will be included in that day's scan.
- Data submitted after 8 am ET and accepted in CAIS will be included in the following day's scan.
- Material Inconsistencies resolved by 8 am ET will be displayed as "Resolved" on the CAIS Reporter Portal by 5 pm ET that day.
 - Material Inconsistencies resolved after 8 am ET will be displayed as "Resolved" on the CAIS Reporter Portal by 5 pm ET the following day.
- All Material Inconsistencies must be resolved by 5 pm ET on the third CAT Trading Day after the submission causing the inconsistency.
 - Material Inconsistency resolution after this deadline will be accepted but considered late.

Feedback and Resolution Availability Examples

Customer #	Submission Timestamp	Day Included in Inconsistency Scan	Day of Feedback Delivery	Resolution Deadline	Resolution <u>After</u> Deadline
1	6 am ET Monday	Monday	5 pm ET Monday	5 pm ET Wednesday	Marked as Late
2	9 am ET Monday	Tuesday	5 pm ET Tuesday	5 pm ET Thursday	Marked as Late

- If Customer 1 is resolved by 8 am on Tuesday, the Status will be displayed as "Resolved" on the CAIS Reporter Portal by 5 pm ET on Tuesday.
- If Customer 1 is resolved by 9 am on Tuesday, the Status will be displayed as "Resolved" on the CAIS Reporter Portal by 5 pm ET on Wednesday.

Material Inconsistencies Schemas

Outstanding Material Inconsistencies Feedback

- A new Outstanding Material Inconsistencies Feedback File is necessary to deliver the simplified Material Inconsistencies feedback.
- Feedback for both the one-time historical scan and daily Outstanding Material Inconsistencies process will be delivered in the new feedback format.
- The new feedback files will be delivered to each CAT Reporter and Submitter via the Reporter Portal and SFTP.
- Feedback will consist of a metadata feedback file and associated data file ("Outstanding Material Inconsistencies Errors Feedback File").
- ▶ The data file will be limited to 400,000 records
 - If the limit is exceeded, another set(s) of metadata + Material Inconsistencies Feedback File will be delivered.
- A sentinel file will be delivered to all Industry Members upon process completion.

Elements of the Outstanding Material Inconsistencies Metadata Feedback File

Field Name	Data Type	JSON Object	Include Key	Description
catSubmitterID	Unsigned	Main	R	The ID of the firm that submitted the file to CAT.
catReporterCRD	Unsigned	Main	R	The CRD number assigned to the Industry Member to which the data within the submission file belongs.
correspondentCRD	Unsigned	Main	С	The CRD number of the related introducing broker or correspondent firm whose Customer and Account data is kept on record at the Industry Member reporting to CAT. Only populated when <i>correspondentCRD</i> is populated in the submission file.
materialInconsistencyCount	Unsigned	Main	R	Total count of Outstanding Material Inconsistencies.
errorFeedbackFilename	Text (100)	Main	R	Name of the corresponding Material Inconsistencies Feedback file.

Outstanding Material Inconsistency Metadata Feedback File

- Metadata Feedback File: Provides a count of outstanding Material Inconsistencies by CAT Reporter CRD and names the corresponding Outstanding Material Inconsistencies Feedback file
 - If no inconsistencies are identified, only an empty sentinel file will be delivered.

Metadata Feedback File Name:

- CAT Submitter ID_CAT Reporter CRD_Correspondent CRD_ File Generation Date_ File Kind_ Group_ File Type.Format Extension
- 99999999_CRD1_2_20240601_OUTSTANDINGINCONSISTENCIES_000001_meta.json

Example:

```
"catSubmitterID": 99999999,

"catReporterCRD": CRD1,

"correspondentCRD": 2,

"materialInconsistenciesCount": 3,

"errorFeedbackFileName": "99999999_CRD1_2_20240601_OUTSTANDINGINCONSISTENCIES_000001_data.json.bz2"
```

Outstanding Material Inconsistencies Errors Feedback File

Material Inconsistencies Errors Feedback File: Provides the details for the Material Inconsistencies that the Industry Member must resolve.

Material Inconsistency Errors Feedback File Name:

- CAT Submitter ID_CAT Reporter CRD_Correspondent CRD_ File Generation Date_ File Kind_ Group_ File Type.Format Extension.Compression Extension
- 9999999_CRD1_2_20240401_OUTSTANDINGINCONSISTENCIES_000001_data.json.bz2

Example:

```
{"type": "materialInconsistency", "submissionFilename": "99999999_CRD1_12012023_Group11_CAIS_000129", "submissionID": 456389, "inconsistencyEventID": "368453$24948#CRD1#NULL#2023-02-28T01:01:26.340000+00:00", "customerRecordID": [367,357], "inconsistencyCode": 30002, "20240401T140000.00000000", "inconsistencyDeadline": "20240403T170000.00000000"},
```

{"type": "materialInconsistency", "submissionFilename": "99999999_CRD1_01122024_Group43_CAIS_000861", "submissionID": 835479, "inconsistencyEventID": "320648651\$24948#CRD1#NULL#2023-02-28T01:01:26.340000+00:00", "customerRecordID": [12], "inconsistencyCode": 30003, "20240401T140000.00000000", "inconsistencyDeadline": "20240403T170000.00000000"},

{"type":"materialInconsistency", "submissionFilename": "99999999_CRD1_01032024_Group32_CAIS_963482", "submissionID": 596634, "inconsistencyEventID": "34698132\$24948#CRD1#NULL#2023-02-28T01:01:26.340000+00:00", "customerRecordID": [68], "inconsistencyCode": 30004, "20240401T140000.00000000", "inconsistencyDeadline": "20240403T170000.00000000"}

Elements of Outstanding Material Inconsistencies Errors Feedback File

Field Name	Data Type	JSON Object	Include Key	Description
type	Choice	Main	R	Set to 'materialInconsistency'.
submissionFilename	Text (100)	Main	R	Name of the file in which the Customer was last submitted.
submissionID	Unsigned	Main	R	The unique Submission ID assigned to the CAIS Data File by the CAT CAIS system. Used to identify the single submission activity. If the same <i>submissionFilename</i> is submitted across multiple submissions, each submission instance will have a separate and unique Submission ID value.
inconsistencyEventID	Text	Main	R	Unique identifier assigned by CAT for the specific Customer – by <i>tidValue</i> – having one or more inconsistencies. This ID is used because the CAT NMS Plan-Defined PII – including <i>tidValue</i> – of the Customer cannot be returned to the Industry Member after it is submitted to CAT.
customerRecordID	Array of Unsigned Values	Main	R	The customerRecordID, as submitted to CAIS, of the record having the inconsistency.
inconsistencyCode	Unsigned	Main	R	The Inconsistency Code of the identified inconsistency on the Customer Record.
identificationDate	Timestamp	Main	R	Date the Material Inconsistency was identified.
inconsistencyDeadline	Timestamp	Main	R	Deadline for resolving the data inconsistency event.

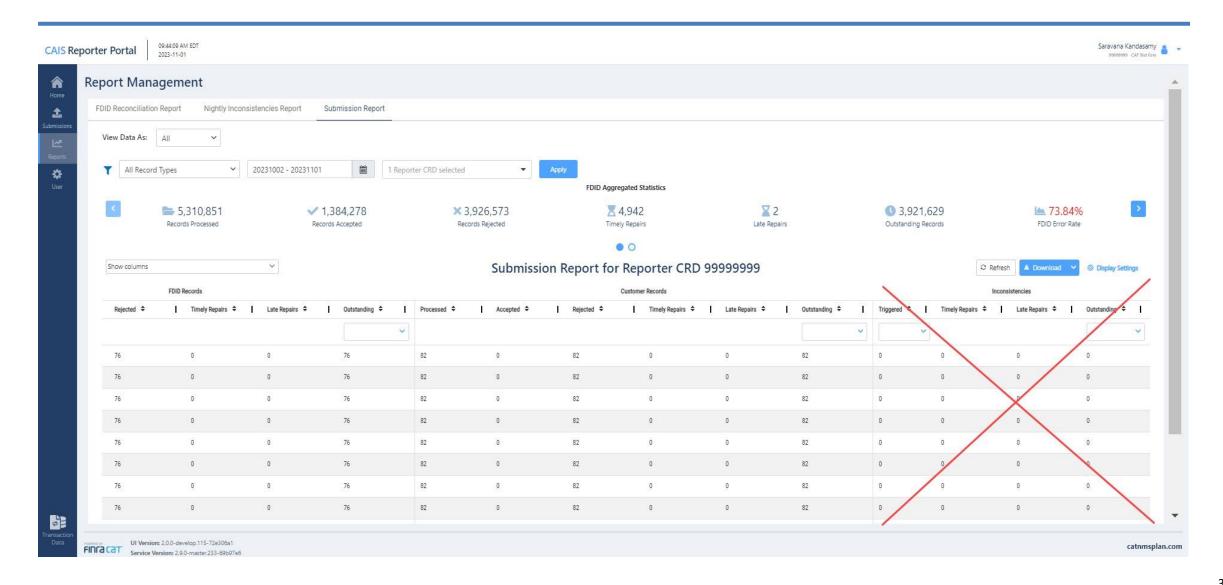
Intra-firm vs Inter-firm Inconsistency Codes

The CAIS Technical Specifications will be updated to include the additional inconsistency codes (highlighted text indicates Planned Technical Specification updates):

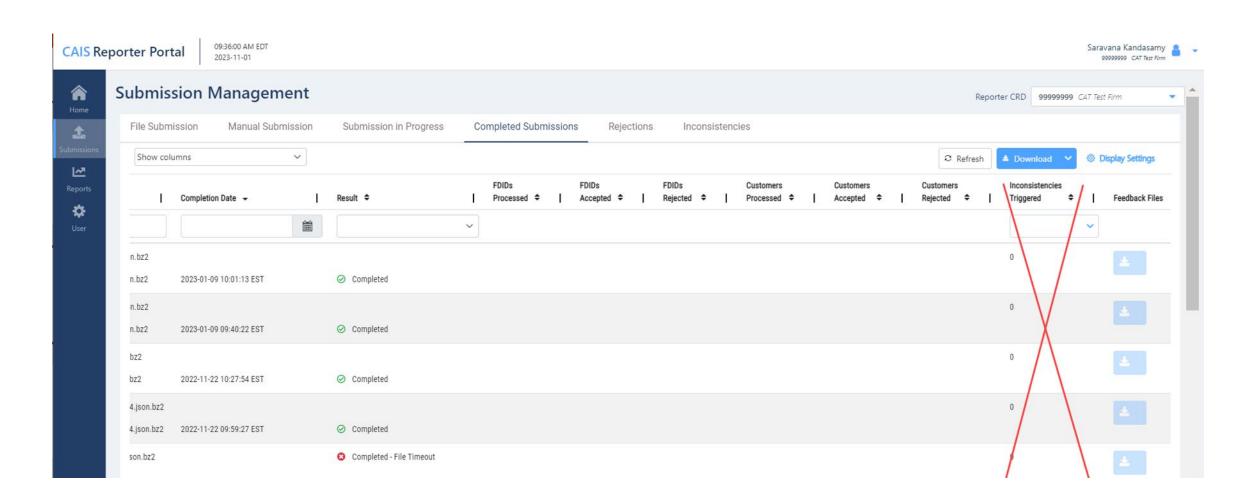
Inconsistency Code	Description
30002	Inconsistent data for yearOfBirth within the Industry Member
30003	Inconsistent data for ein within the Industry Member
30004	Foreign TID reported as both Natural Person and Legal Entity within the Industry Member
40002	Inconsistent data for <i>yearOfBirth</i> across Industry Members, or within a single clearing firm across correspondents
40003	Inconsistent data for ein across Industry Members, or within a single clearing firm across correspondents
40004	Foreign TID reported as both Natural Person and Legal Entity across Industry Members, or within a single clearing firm across correspondents

Updates to CAIS Reporter Portal Screens

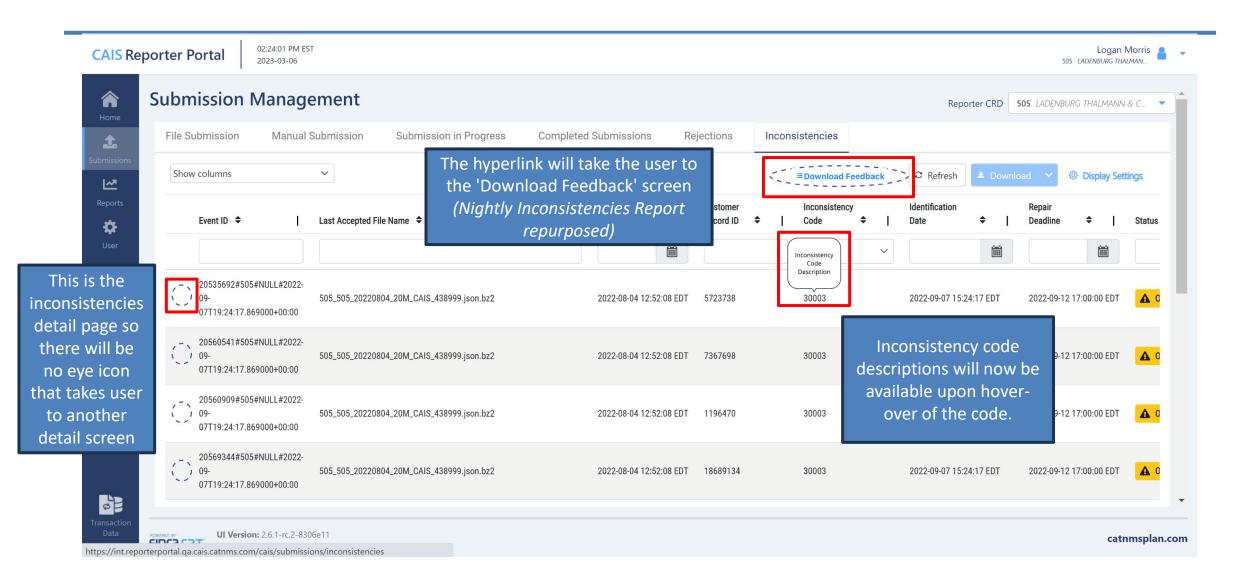
Updates to Submission Report Screen



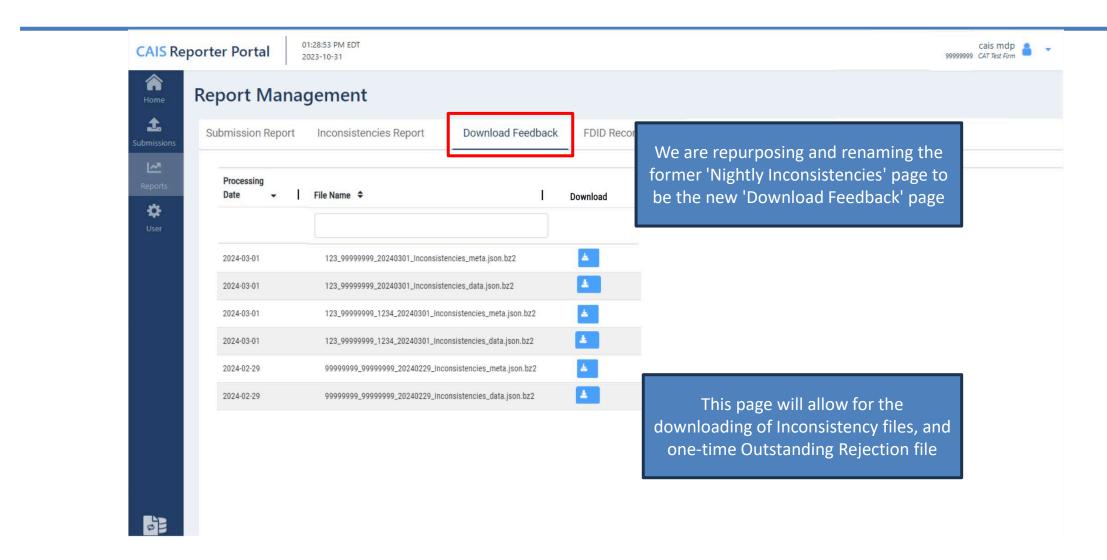
Updates to Completed Submissions Screen



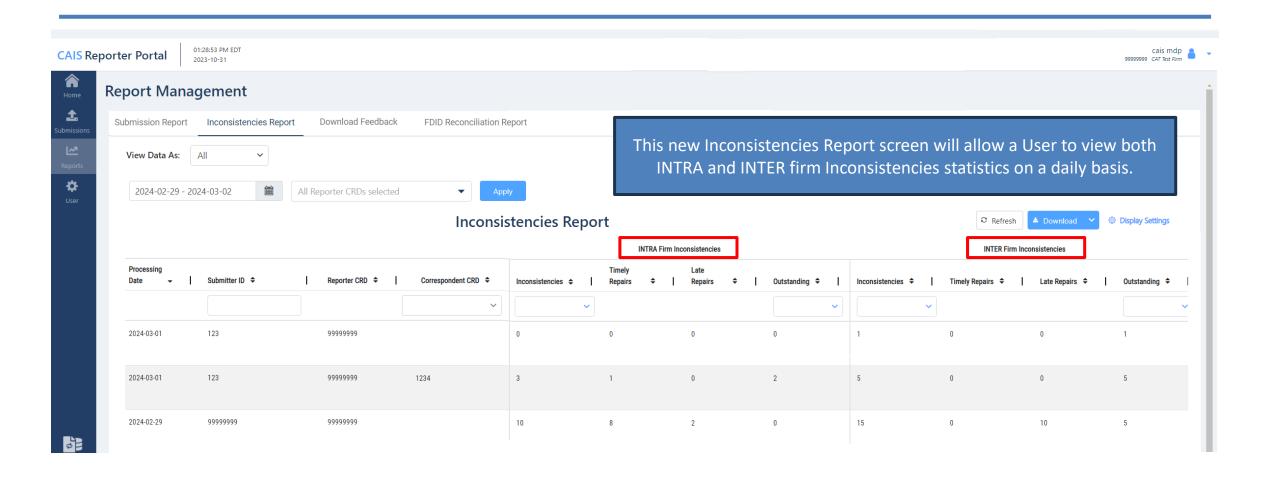
Updates to Inconsistencies Screen



Updated Nightly Inconsistencies Report to Download Feedback Screen



Inconsistencies Report - Daily Inconsistencies Statistics (New Screen)



FINRA CAT Helpdesk

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

Q&A

How to Ask a Question during Today's Call

For participants using computer audio:

- Click the "Raise Hand" button at the bottom of the participants window.
- A visual prompt will indicate that your line has been unmuted.

For participants using phone audio:

- Enter *9 on your phone keypad.
- An audio prompt will indicate that your line has been unmuted.