

# FINRA CAT Industry Member Onboarding Guide

4/2/2020

Version 1.8

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## Change Log

Version	Date Published	Description of Change(s)
1.0	7/31/2019	Guide initially published on the CAT NMS web site.
1.1	8/7/2019	<ul style="list-style-type: none"> <li>• §4 has been updated to reflect that SAAs and AAs can grant entitlements to the Reporter Portal beginning on September 9, 2019, rather than the previously indicated August 30, 2019.</li> <li>• A change Log has been added to the document.</li> </ul>
1.2	8/16/2019	<ul style="list-style-type: none"> <li>• A link to the FINRA CAT Connectivity Supplement for Industry Members has been added to Companion Documents</li> <li>• §6 has been updated to reflect publication of the FINRA CAT Connectivity Supplement for Industry Members</li> </ul>
1.3	11/4/2019	<ul style="list-style-type: none"> <li>• Multi-factor authentication information has been added as §7</li> <li>• Added links to CAT Reporter Agreement location in §2</li> <li>• Updated the link in the Companion Documents to point to latest CAT Connectivity Supplement</li> </ul>
1.4	12/6/2019	<ul style="list-style-type: none"> <li>• Additional requirements regarding the expiration of temporary passwords for new accounts has been added to §4.</li> <li>• Added link for CAT Reporter Portal User Guide</li> </ul>
1.5	12/17/2019	<ul style="list-style-type: none"> <li>• Changes to Overview, §2 and §10 to describe the option of the Industry Member Limited Testing Acknowledgement Form.</li> </ul>
1.6	1/14/2020	<ul style="list-style-type: none"> <li>• Added security token information and links to test environments in §7</li> <li>• Updated the link in the Companion Documents to point to the latest publication of the FINRA CAT Connectivity Supplement for Industry Members</li> </ul>
1.7	3/24/2020	<ul style="list-style-type: none"> <li>• Added Duo country prohibition in §7.</li> </ul>
1.8	4/2/2020	<ul style="list-style-type: none"> <li>• Updated Section 11 with new Production Readiness Certification Requirements for CRAs</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. See, e.g., 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: <https://www.sec.gov/rules/final/2012/34-67457.pdf> and the CAT NMS Plan: <https://www.catnmsplan.com/wp-content/uploads/2018/02/34-79318-exhibit-a.pdf>.

## Onboarding Overview

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

1. Register for CAT
2. Submit the CAT Reporter Agreement (for Industry Members - or Industry Member Limited Testing Acknowledgement Form)
3. Designate Account Administrators
4. Create / Entitle CAT User Accounts for the CAT Reporter Portal
5. Request CAT Secure File Transfer Accounts
6. Manage Connectivity
7. Enroll in Multi-Factor Authentication
8. Establish CAT Reporting Relationships in the Test Environment
9. Establish ATS Order Types in the Test Environment (if applicable)
10. Submit the CAT Reporter Agreement (if not completed in Step 2)
11. Conduct Testing for Production Readiness
12. Certify 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 CAT Production Environment will be authorized.

### Questions

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

## Companion Documents

- CAT Reporting Technical Specifications for Industry Members, CAT Industry Member Reporting Scenarios, and Industry Member JSON Schema: <https://www.catnmsplan.com/technical-specifications/index.html>
- Entitlement Reference Guide for Super Account Administrators: <http://www.finra.org/sites/default/files/finra-entitlement-program-saa-reference-guide.pdf>
- Reporter Portal User Guide: <https://www.catnmsplan.com/registration/>
- FINRA CAT Connectivity Supplement for Industry Members: <https://www.catnmsplan.com/registration/>
- Frequently Asked Questions: <https://www.catnmsplan.com/faq/index.html>

## 1. Register for CAT

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 CAT system.

The CAT NMS Plan Registration Form must be submitted online at [www.catnmsplan.com/registration/index.html](http://www.catnmsplan.com/registration/index.html).

The information collected on the registration form includes:

- Company Name, Address, Type of Organization, CRD number<sup>1</sup>
- Primary and Secondary Contact Name, Phone, Email
- Registered Principal Name, Phone, Email (Not Applicable to Service Bureaus)
- Primary and Secondary Source of CAT Reporting (Self-Reporting or Vendor)
- Preferred Connectivity (SFTP and/or CAT Reporter Portal)
- Type of Securities Traded (Equities and/or Options)
- Whether the firm qualifies as a Small Broker Dealer (Not Applicable to Service Bureaus)
- Whether the firm reports to OATS
- Default CAT Reporting IMID (Not Applicable to Service Bureaus)

Industry Members may use any SRO-assigned identifier (e.g., a Market Participant Identifier) that is valid on the CAT Trading Day as the CAT Reporter IMID to report events for that day. However, each CAT Reporter must provide a Default CAT Reporting IMID during registration. If an Industry Member does not have an identifier assigned to them, they should request an identifier from their Designated Examining Authority (“DEA”).

A list of default CAT Reporting IMIDs will be published for use by other reporters to resolve unlinked records. See [CAT Alert 2018-003](#) for more information.

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<sup>1</sup> CAT Reporting Agents that do not have a CRD number 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 CAT Entitlement Team in the notification email alerting that Account Administrator access has been granted.

## **2. Submit the CAT Reporter Agreement or Industry Member Limited Testing Acknowledgement Form**

In order to gain access to the Industry Test Environment, CAT Reporters are required to submit either the CAT Reporter Agreement OR the Industry Member Limited Testing Acknowledgement Form. CAT Reporting Agents are required to submit the CAT Reporting Agent Agreement.

If an Industry Member CAT Reporter elects to test with fabricated test data or obfuscated production data (“Test Data”), they need to electronically sign the Industry Member Limited Testing Acknowledgement Form in lieu of the CAT Reporter Agreement. If an Industry Member CAT Reporter plans to test with production (live) data, the Industry Member Limited Testing Acknowledgement Form is **not** applicable. The Industry Member using production (live) data during testing must electronically sign the CAT Reporter Agreement.

While no particular obfuscation methodology will be required for IM CAT Reporters that choose to test with obfuscated production data, any methodology used should ensure that the actual terms and conditions of any particular transaction record cannot be determined. For example, the date, price, share quantity, buy/sell code, capacity, FDID or security symbol (as long it is changed to another valid symbol on the applicable transaction date) could be changed prior to submitting data. IM CAT Reporters should note that all production validations detailed in the IM Technical Specifications are in effect in the IM Test Environment, including, among others, IMID and issue symbol validations so actual IMIDs and issue symbols must be used or records will not pass reference data validations. Each IM CAT Reporter is solely responsible for employing adequate obfuscation.

CAT Reporters that sign the Industry Member Limited Testing Acknowledgement Form because they are using test data in the Industry Test environment must sign a CAT Reporter Agreement prior to CAT Testing Certification and gaining entitlement to the CAT Production system.

### **2.1. CAT Reporter Agreement**

#### **2.1.1. Industry Members**

Industry Members must electronically sign a *CAT Reporter Agreement* to access the Industry Test environment to use production (live) data for testing, AND to access the CAT Production system. The CAT Reporter Agreement is available for electronic signature on the CAT NMS Web Site:

<https://catnmsplan.com/registration/>.



### **2.1.2.CAT Reporting Agents**

Organizations (“CAT Reporting Agents”) that are not members of any Plan Participant but report to CAT on behalf of Industry Members must sign a CAT Reporting Agent Agreement before entitlement to CAT Test and Production environments will be processed. The CAT Reporting Agent Agreement is available for electronic signature on the CAT NMS Web Site: <https://catnmsplan.com/registration/>.

### **2.2. Industry Member Limited Testing Acknowledgement Form**

Industry Members electing to use test data to begin testing in the Industry Test Environment need to electronically sign the Industry Member Limited Testing Acknowledgement Form before entitlement to CAT will be processed. As of December 20, 2019, the Industry Member Limited Testing Acknowledgement Form is available for electronic signature on the CAT NMS Web Site: <https://catnmsplan.com/registration/>.

### 3. Designate Account Administrators

Access to CAT 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.

#### 3.1. Request a Super Account Administrator (applicable to Industry Members only)

Industry Members must have a Super Account Administrator (“SAA”) to serve as the primary entitlement contact. Industry Members that have an SAA established with the FINRA Entitlement Program will use that SAA for CAT access; no further action is required. Upon submission and verification of the prerequisites, the SAA will be granted with the capability to provide CAT access to users and create Account Administrators to assist in maintaining user access to CAT.

Firms that do not have a FINRA SAA must complete the [New Organization SAA Entitlement Form](#) to designate an SAA and to authorize set up of this type of account. Once the new SAA form is verified and processed, the SAA will receive an email with log on credentials and have the capability to grant access to CAT and other FINRA systems.

To replace the SAA, contact the FINRA CAT Helpdesk at 888-696-3348 or at [help@finracat.com](mailto:help@finracat.com) to request an *Update/Replace SAA Form*. The form will be emailed to the Authorized Signatory who signed the form authorizing the former SAA.

An [SAA Reference Guide](#) that includes setting up Account Administrators and users and fulfilling other responsibilities of the role is available on FINRA.org.

#### 3.2. Designate CAT Account Administrators (applicable to Reporting Agents that are not a member of a Plan Participant)

CAT Reporting Agents that are not members of any Plan Participant but report to CAT on behalf of Industry Members must use a CAT Account Administrator (“CAT AA”) role to manage access to CAT. To designate a CAT AA, the organization must submit a [CAT Account Administrator Entitlement Form](#)<sup>2</sup> (“CAT AAEF”). An organization may designate more than one CAT AA by completing a form for each individual who will perform this role.

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<sup>2</sup> CAT Reporting Agents that are not members of any Plan Participant must complete a CAT AAEF to designate a CAT AA.



To replace a CAT AA, use the CAT Account Administrator Entitlement Form and complete the applicable section. CAT AAs cannot create or edit their own accounts or the accounts of other CAT AAs. For help with their accounts, CAT AAs will need to contact the FINRA CAT Helpdesk at 888-696-3348 or [help@finracat.com](mailto:help@finracat.com).

## **4. Create / Entitle CAT User Accounts for the CAT Reporter Portal**

Once an organization meets the prerequisites for access including: registering for CAT, submitting a CAT Reporter Agreement (or Industry Member Limited Testing Acknowledgement Form), and designating an Account Administrator, the FINRA Entitlement Team will grant access to the Super Account Administrators (“SAA”) or CAT Account Administrators (“CAT AA”) to the CAT Test Environment.

SAs and CAT AAs for organizations that have met the prerequisites defined above will have the ability to create user accounts and grant entitlement to the CAT Reporter Portal starting on September 9, 2019. Please note that the CAT Reporter Portal will be available in the Test Environment on November 18, 2019.

### **4.1. CAT Reporter Portal User Types**

#### **4.1.1. CAT Account Administrator**

CAT AAs have the highest level of access in CAT. In the CAT Reporter Portal, CAT AAs can:

- Create, view, and transmit reportable events
- Upload data files
- View and repair errors
- Create, view, and edit Reporting Relationships
- Create, view, and edit ATS Order Types
- View and export feedback, including announcements, reporting summaries, and all error records
- View monthly report cards
- Create and edit user preferences

In the FINRA Entitlement system, CAT AAs can:

- Create, edit, disable, and delete CAT User and CAT Read-Only accounts
- Unlock and reset passwords for CAT Users and CAT Read-Only accounts
- CAT AAs cannot create, edit, disable, or delete their own accounts, or the accounts of other CAT AAs, nor can they unlock or reset other AA’s passwords. Only the SAA can maintain CAT AA accounts.

#### **4.1.2.CAT User**

CAT Users can do the following in the Reporter Portal:

- Create, view, and transmit reportable events
- Upload data files
- View and repair errors
- Create, view, and edit Reporting Relationships
- Create, view, and edit ATS Order Types
- View and export feedback, including announcements, reporting summaries, and all error records
- View monthly report cards
- Create and edit user preferences

#### **4.1.3.CAT Read-Only User**

Read-Only users can do the following in the CAT Reporter Portal:

- View Reporting Relationships
- View ATS Order Types
- View and export feedback, including announcements, reporting summaries, and all error records
- View monthly report cards

### **4.2. Instructions to Create, Modify, and Delete CAT Accounts**

SAs and CAT AAs may create, edit, and delete CAT User and CAT Read Only accounts per the following instructions:

1. Log into the [FINRA Firm Gateway](#) and select the User Administration tab.

2. Select **Create New Account** to create a new user account (skip to step 7 below for instructions on modifying and deleting accounts).
3. Complete the following sections of the new user’s account. All required fields are marked with an asterisk.
  - Provide user’s name and contact information. Click the link to generate a User ID automatically, or create a User ID for the new user.
  - In Account Profile, provide a temporary password for the user. The user will be prompted to change the password upon first logging into the system.

4. On the Account Management screen, in the Application Privileges section, select the entitlement(s) for the CAT Reporter Portal based on the user's intended role in the system:
  - CAT Reporter Portal - application access (note: you will also need to assign one of the privileges below in order for the user to use the application)
  - CAT Admin – CAT Account Administrator access, as defined in 4.1.1
  - CAT User – CAT User role, as defined in 4.1.2
  - CAT Read Only – CAT Read-Only access, as defined in 4.1.3
5. Click Save.
6. Highlight the account information that appears at the top of the screen, copy the credentials, and provide them to the user.

## Account Management: Account Saved

The account has been saved for "Jane Doe (jdoe33)".

You can copy-and-paste password notification data from the following bar:

jdoe33      Doe, Jane      Gu8+dWuc?#uk3=++

### IMPORTANT NOTE REGARDING THE ONBOARDING PROCESS

It is recommended that you provide the credentials to the user immediately. **The user must complete all steps of the onboarding process within 120 hours (5 days) of account creation.** Onboarding steps include (1) logging in to the account, (2) resetting the temporary password, (3) providing security challenge questions and answers, and (4) enrolling in multi-factor authentication<sup>3</sup>.

**Failure to complete all onboarding steps within 120 hours of account creation will result in the immediate expiration of the temporary password and automated revocation of CAT entitlements for the user account.** When this occurs, the SAA or CAT Account Administrator must grant the necessary CAT entitlements again and set a new temporary password if the user requires CAT system access.<sup>4</sup>

<sup>3</sup> See [§7 Enroll in Multi-Factor Authentication \(MFA\)](#) for information on enrolling.

<sup>4</sup> Additional resources for managing user accounts can be found at the end of this section.

- When modifying or deleting an account, select the User ID from the search results to open the user's account.

**User Administration**

- Account Management
  - Create New Account
  - Start New Search
- Help

**Account Management: Search Results [Active Users]** Printer Friendly

To download this information to your computer, click "Download Results".

Result 1 of 1 Select any header to sort, select again to reverse the sort.

User ID	Last Name	First Name	Middle Name	Email	Department	SAA	Account Status	Applications Administered
<a href="#">firm9999999</a>	Doe	John		john@test.org		No	Active	

Start New Search : [Expand / Collapse](#)

- Select Edit Account to modify a user's account, or Delete Account to delete the user's account.
  - Deleted accounts cannot be reactivated.**
- Modify the user's account and click Save, or click Delete to remove the user.

*Note: SAAs and CAT AAs can also change a user's password or unlock an account in Password Lockout status in the User Administration tab.*

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

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

[FINRA Entitlement Reference Guide](#)



## 5. Request CAT Secure File Transfer Accounts

CAT 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 CAT 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. To request a CAT SFTP Entitlement Form, contact the FINRA CAT Help Desk at 888-696-3348 or [help@finracat.com](mailto:help@finracat.com).

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.

### *Notes:*

- Existing FINRA FTP accounts cannot be leveraged to submit data to or receive data from CAT.
- SFTP accounts cannot be used to access the CAT Reporter Portal Web Interface.

## 6. Manage Connectivity

Connectivity to CAT will be via private line or the CAT Reporter Portal. Private line connectivity will be provided via a managed private network. Private line solutions will provide access to both the SFTP (Secure File Transfer Protocol) service for machine-to-machine connectivity, as well as to the CAT Reporter Portal for interactive reporting through web-based forms or manual file upload.

The CAT Reporter Portal will also be accessible via the web using a secure, authenticated internet connection. This method of connectivity requires the use of modern browsers supporting HTML5 and TLS (Transport Layer Security). No client software installation is required.

Connectivity details are provided in the [FINRA CAT Connectivity Supplement for Industry Members](#).

## 7. Enroll in Multi-Factor Authentication (MFA)

The Reporter Portal requires multi-factor authentication, or MFA, to provide an additional layer of security beyond the User ID and password required for login. Multi-factor authentication is required for users accessing the Reporter Portal via private line connection, AWS Private Link, or the Secure Reporting Gateway over the internet. The second-level authentication is provided by Duo, and end users must enroll a smart phone, tablet, or U2F security key (e.g., a Yubikey or Feitian key)<sup>5</sup> in the Duo service to initiate the authentication process and to use this service going forward.

Effective April 13, 2020, Duo Push authentication will be rejected from mobile devices in the following sixteen countries:

Afghanistan	Mali
Bolivia	North Korea (Democratic People’s Republic of Korea)
Burkina Faso	Russia (Russian Federation)
Central African Republic	Somalia
China	South Sudan
Iran (Islamic Republic of Iran)	Syria (Syrian Arab Republic)
Iraq	Venezuela
Libya (Libyan Arab Jamahiriya)	Yemen

### MFA Requirements

If using a smart phone or tablet:

- The device must have a screen lock enabled.
- The device must be on an operating system that is not identified as “end-of-life”. While the system will encourage users to download the most current version of their operating system,

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<sup>5</sup> MFA via security keys are enabled beginning March 2, 2020.

it will not prevent entry by lower versions, as long as they are not identified as end-of-life versions. Consult your OS provider for more information about which operating systems are considered end-of-life.

- End-of-life operating systems are supported for a short grace period after their end-of-life date. If a user attempts to use a device with an end-of-life operating system during that time, they will be able to authenticate, but will be notified that they need to update their operating system. After the grace period, they will no longer be able to access CAT systems without updating their operating system.

If using a security key:

- The computer used to access CAT must have a USB port, and no USB block enabled that would restrict use of that USB port.
- The user must access CAT via a supported browser (Chrome 70 or later, Firefox 60 or later, or Opera 40, or later) for authentication.
- The user must have a supported security key. Duo MFA supports WebAuthn/FIDO2 security keys such as those offered by Yubico and Feitian. U2F-Only security keys such as Yubikey NEO-n are not supported with Firefox.

*FINRA CAT does not endorse any specific security key vendor or model, and recommends that organizations perform adequate testing to ensure that the device they intend to use is compatible with Duo MFA for FINRA CAT. More information on Duo-compatible security keys is available on Duo's [website](#).*

### Supported Operating Systems for Authentication Devices

Operating System	Access Policy
iOS	End-of-life versions are blocked
Android	End-of-life versions are blocked
Windows Phone	No versions blocked
Mac OS X	End-of-life versions are blocked
Windows	No versions blocked
Linux	No versions blocked
Chrome OS	No versions blocked

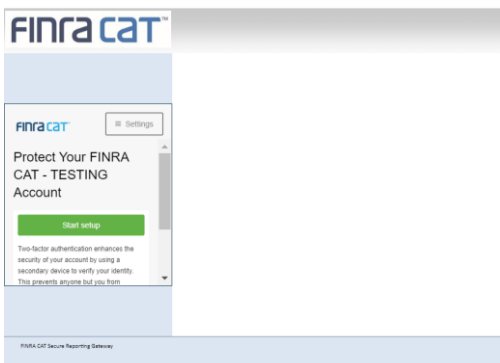
Other Operating Systems	All versions blocked
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### 7.1.1. Enroll in Duo MFA service

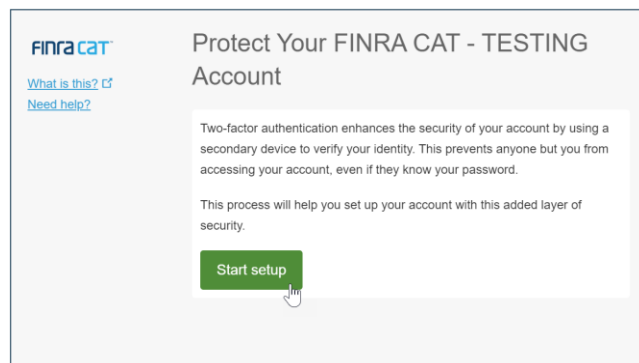
All users must enroll in the Duo MFA service to be able to access the Reporter Portal. The following enrollment steps only need to be completed once per CAT user account. New users will be prompted to complete these steps before they can access the Reporter Portal.

- Navigate to the Reporter Portal based on your connectivity method:
  - Internet users: log into the Secure Reporting Gateway at <https://srg.ct.catnms.com> (test) or <https://srg.catnms.com> (production, effective April 2020), using your FINRA Entitlement Account.
  - Private line users: access the Reporter Portal directly at <https://reporterportal.ct.catnms.com> (test) or <https://reporterportal.catnms.com> (production).
  - AWS Private Link users: connect via at <https://reporterportal-pl.ct.catnms.com> (test) or <https://reporterportal-pl.catnms.com> (production) (effective February 2020).
- Click **Start setup** to begin the enrollment process. *Note: the appearance of the setup screens will differ for users logging in via the Secure Reporting Gateway (first screen shot below) versus private line/Private Link users who will not enter via the Gateway (second screen shot). The process to enroll is the same, however.*

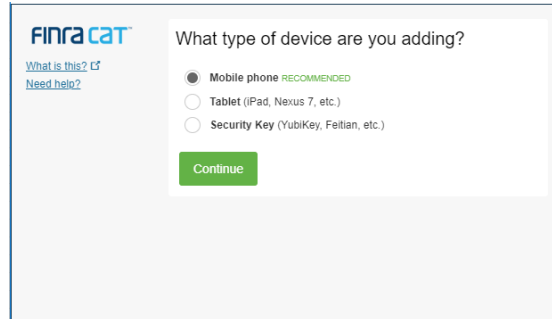
Secure Reporting Gateway



Private Line/Private Link



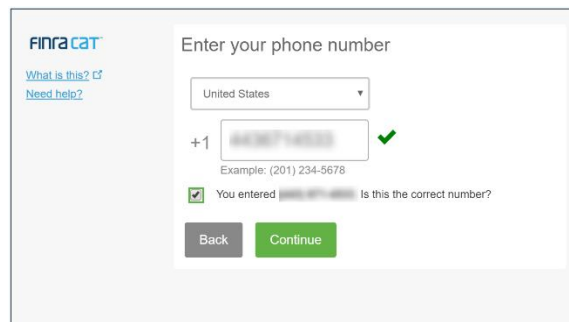
3. Select the type of device you will use for authentication (mobile phone, tablet, or security key) and click **Continue**.



**To enroll a phone or tablet, continue to Step 4. To enroll a security key, skip to Step 5.**

4. Complete the following steps to enroll a **phone or tablet** in Duo MFA:
  - a. If enrolling a phone, enter the phone number of the device and check the box to confirm the phone number. **The user must have access to the device associated with this phone number to log into the Reporter Portal.** If enrolling a tablet, no phone number is required.
  - b. Click **Continue**.

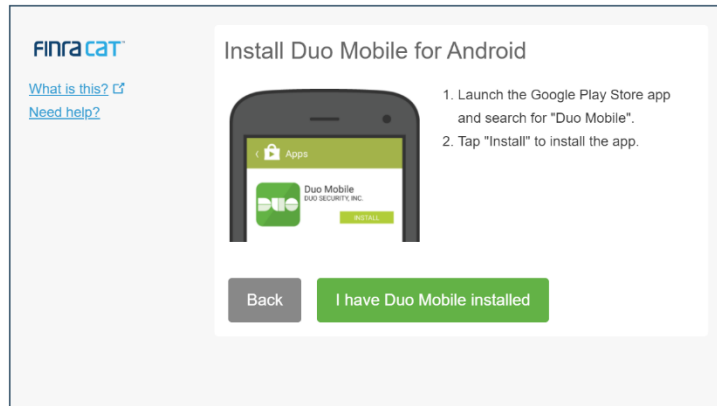
**Note: If the phone number entered is in use for authentication by another user account, the system will return an error stating that the number cannot be added. Please contact the CAT Help Desk ([help@finracat.com](mailto:help@finracat.com)) to request that the number be enabled for use with a second account.**



- c. Select the type of phone or tablet being enrolled.

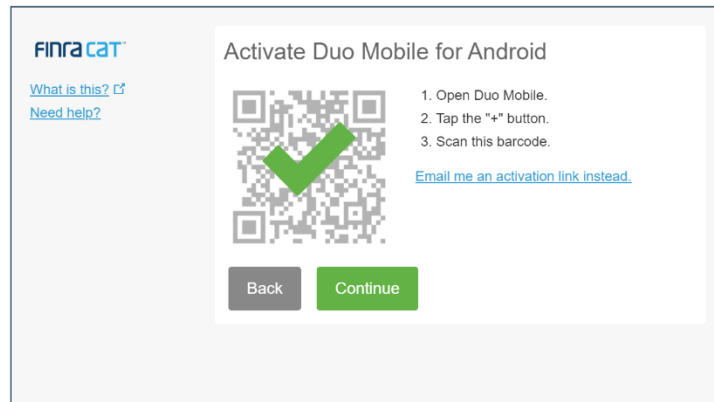


- d. If the Duo Mobile application is not already installed on the device, follow the instructions to complete installation.

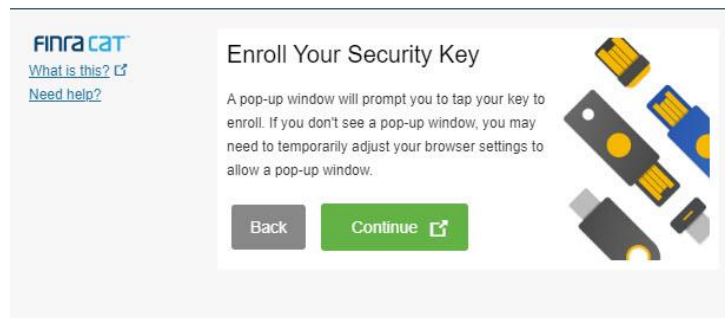


- e. Click **I have Duo Mobile installed**. A barcode will appear on your computer screen.
- f. Using the Duo mobile application, click the + to scan the barcode<sup>6</sup> and link the Duo Mobile application to your CAT user account. **Note: you must authorize Duo Mobile to access your smart phone or tablet camera to complete this step.**

<sup>6</sup> If unable to scan the barcode, click the option to have an activation link sent to you via email.

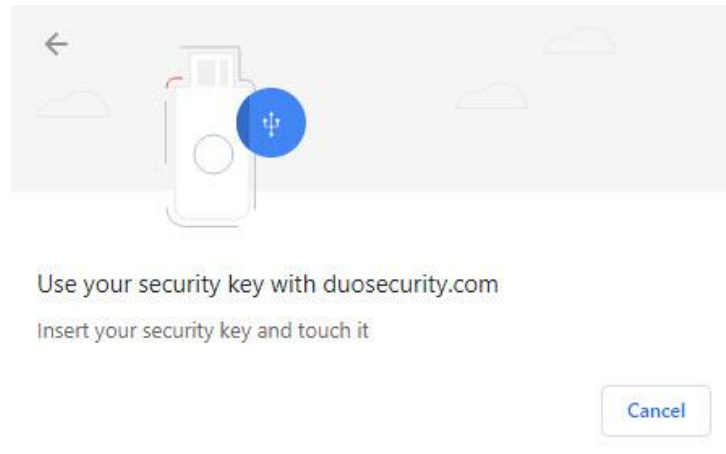


- g. Click **Continue** to complete enrollment.
  - h. Once enrolled, review the user settings and devices. Click **Save** when finished.
5. Complete the following steps to enroll a **security key** in Duo MFA:
- a. Click **Continue** to begin enrolling your security key.



- b. Insert your security key into the USB port on your computer and, if needed for the model used, tap the key or press the button.



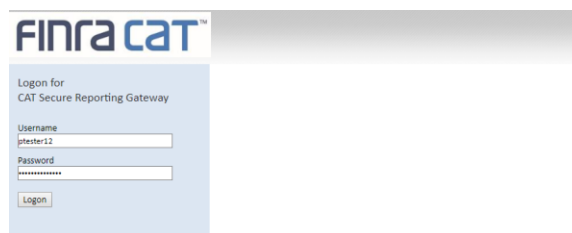


- c. A message will appear confirming that your enrollment was successful.

### 7.1.2. Log In Using Duo MFA Service

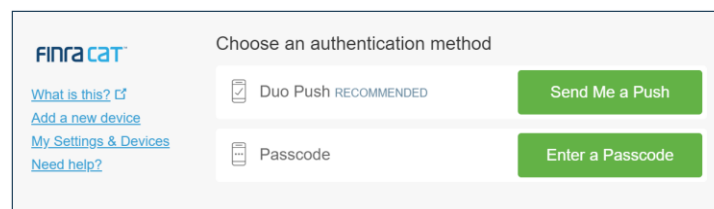
The User ID, Password, and Duo MFA authentication must be provided each time the user accesses the Reporter Portal. Users logging in via the Secure Reporting Gateway must first enter the User ID and Password and authenticate via MFA to enter the Gateway, and then must enter their User ID and Password again when navigating into the Reporter Portal.

1. Access the Reporter Portal via the web through the Secure Reporting Gateway at <https://srg.ct.catnms.com> (test) or <https://srg.catnms.com> (production), via private line at <https://reporterportal.ct.catnms.com> (test) or <https://reporterportal.catnms.com> (production), or via AWS Private Link at <https://reporterportal-pl.ct.catnms.com> (test) or <https://reporterportal-pl.catnms.com> (production) (effective February 2020).
2. Enter the User ID and Password.



3. To authenticate using a **security key**, insert the security key and, if required, tap the key or push the button.

4. To authenticate using a **phone or tablet** where the account preferences have been set to **automatically push a notification**:
  - Access the Duo Mobile application on the associated device.
  - Approve the request.
  
5. To authenticate with a **phone or tablet** where the account preferences have been set to **select the authentication method**, select the desired method for this login.



**To authenticate using a push notification:**

- Click **Send Me a Push**.
- Access the Duo Mobile application on the associated device.
- Approve the request.

**To authenticate using a one-time passcode:**

- Click **Enter a Passcode**.
- Access the Duo Mobile application on the associated device to retrieve the one-time passcode.
- Enter the passcode and click **Log In**.

Note: if the authentication device cannot be accessed, the user may contact the FINRA CAT Help Desk. Once the Help Desk confirms the user's identity, they can provide a one-time passcode that can be used for one-time authentication. **Users without an authentication device enrolled cannot be provided with a passcode.**

6. If accessing the Reporter Portal via the web, select the Reporter Portal application from the Secure Reporting Gateway and log in with your User ID and Password.

## 8. Establish CAT Reporting Relationships in the Test Environment

CAT Reporting Relationships are required to authorize a Reporting Agent to report on behalf of a CAT Reporter and to authorize a Third-Party Reporting Agent to view data submitted on behalf of a CAT Reporter by another Submitter. Firms that will not use a Reporting Agent or Third-Party Reporting Agent are not required to add Reporting Relationships.

During onboarding, CAT Reporting Relationships must be entered using the CAT Reporter Portal in the Test Environment, which will be available beginning November 18, 2019. There are two types of Reporting Relationships:

**Reporting Agent (Submitter)** – Authorizes an organization to transmit data to CAT on behalf of a CAT Reporter IMID.

- For SFTP submissions, Reporting Agents will receive a copy of the error feedback in their SFTP feedback folder for data submitted on behalf of the CAT Reporter.
- Using the CAT Reporter Portal, Reporting Agents can view and take action on Reporting Feedback and Errors for the submissions made by the Reporting Agent on behalf of the CAT Reporter.
- Relationship record requires:
  - IMID of the CAT Reporter
  - CRD# / Org ID of the Reporting Agent (Submitter ID)

**Third-Party Reporting Agent** – Authorizes an organization to view data submitted on behalf of a CAT Reporting IMID by another Submitter.

- In addition to the Reporting Relationship, Third-Party authorization requires the inclusion of the Third-Party Reporting Agent's identifier in the Metadata File submission by the Submitter.
- For the data files transmitted by the Submitter for which the Third-Party Reporting Agent is designated, all associated Reporting Feedback and Errors can be viewed by the Third-Party Reporting Agent using the CAT Reporter Portal.
- Third-Party Agents must have a Reporting Agent relationship to submit repairs to CAT.
- Relationship record requires:
  - IMID of the CAT Reporter
  - CRD# / Org ID of the Reporting Agent (Submitter ID)
  - CRD# / Org ID of the Third-Party Reporting Agent

*Note: Existing OATS Reporting Relationships cannot be leveraged.*

## 9. Establish ATS Order Types in the Test Environment

Industry Member ATSs are required to register ATS Order Types with CAT at least 20 days prior to the Order Type becoming effective. During onboarding, ATS Order Types must be entered using the CAT Reporter Portal in the Test Environment, which will be available beginning November 18, 2019.

The following information must be provided for each Order Type used by an ATS:

- ATS MPID
- Order Type Identifier assigned by the ATS
- Description of how the Order Type operates within the ATS
- Effective date of the Order Type
- Expiration Date of the Order Type

Industry Members may not reuse Order Type Identifiers for the same ATS MPID. See [CAT Alert 2019-01](#) for more information.

*Note: ATSs must re-register all Order Types. Order Types established in OATS cannot be leveraged.*

## **10. Submit the CAT Reporter Agreement**

Prior to conducting Production Readiness Certification, all Industry Members must submit a CAT Reporter Agreement. If a CAT Reporter Agreement was not submitted previously (as described in Section 2), An Industry Member CAT Reporter must electronically sign the CAT Reporter Agreement in order to submit production (live) data to the Industry Member Test Environment.

A CAT Reporter may change from a Limited Testing submitter to a fully entitled submitter at any time by completing the CAT Reporter Agreement and notifying the FINRA CAT Helpdesk.

## 11. Conduct Testing for Production Readiness

By April 6, 2020, Industry Members and CAT Reporting Agents are required to perform testing to demonstrate their ability to successfully submit data to CAT. Production readiness testing is limited to the validations in effect when an Industry Member is required to begin reporting data to CAT. More specifically, for all Industry Members that are required to begin reporting equity data to CAT on April 20, 2020, production readiness testing will be limited to entitlements, file submissions, and data integrity validations. See also Table 1 below.

Testing is performed in the CAT Test Environment, which is production-equivalent. The CAT Test Environment will be available for submissions starting on December 16, 2019. CAT Reporters have no volume limitation and may submit full production-equivalent loads to the Test Environment. Additionally, validations and feedback processes mirror those of the Production Environment. Test symbols will be accepted in the Test Environment, which is available 24x6.

For any BD that has completed their production certification by close of business on April 3, 2020, the CAT reporting relationships established by that BD in the Test Environment will be ported to the Production Environment when FINRA CAT opens the Production Environment on April 13, 2020. To prevent a certified CRA from submitting data to the Production Environment on behalf of a BD that has not certified, FINRA CAT will not port any relationships for BDs that are not certified as of April 3, 2020. After April 3, 2020, BDs will need to manually establish the relationship in the Production Environment upon certification.

Any relationships with an Expiration Date on or prior to April 10, 2020 will not be ported to the Production Environment. Relationships that Industry Members do not want to be automatically ported to the Production Environment must be expired on or prior to April 10, 2020.

### 11.1. Production Readiness Testing Requirements for Self-Reporting Firms

Firms that will report to CAT on their own behalf must perform the following:

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

**Step 2:** Successfully submit at least one data file and one metadata file to the Test Environment for each of its CAT Reporter IMIDs without error.

**Step 3:** Successfully submit a single day of production data to the Test Environment with an error rate<sup>7</sup> of less than 10%.

**Step 4:** Record the CAT Processing Date on which the single day of production data was submitted to the Test Environment.

## 11.2. Production Readiness Testing Requirements for CAT Reporting Agents (“CRA”)

CAT Reporters and CAT Reporting Agents (“CRA”) that will report to CAT on behalf of a firm must perform the following:

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

**Step 2:** Ensure the CRA is identified in a CAT Reporting Relationship in the Test Environment by CAT Reporter(s) for which the CRA will transmit data to CAT. The CRA must provide a complete list of IMIDs for which it plans to report. FINRA CAT will validate that the relationships for each IMID have been created in the CAT Reporter Portal.

**Step 3:** Successfully submit data files and metadata files to the Test Environment that contain all the event types that the CRA will support.

**Step 4:** Successfully complete a capacity test by submitting a single day of full production volume to the Test Environment. The capacity test should include data for each of the CAT Reporter IMIDs for which the CRA is reporting. If a CRA plans to submit data for an IMID that is not yet prepared to submit data to CAT, the CRA should estimate the number of events to be processed and expected utilization of the IMID for the purpose of the capacity test.

If a CRA is also an Industry Member that plans to self-report its own data along with data submitted on behalf of other firms, the CRA must certify its own IMIDs under the requirements outlined in Section 11.1. If the data submitted on behalf of other firms will exceed 50% of the anticipated daily volume submitted by the CRA across all entities, the CRA must conduct a load test as described above.

**Step 5:** Record the CAT Processing Date on which the single day of production data was submitted to the Test Environment.

## 11.3. Production Readiness Testing Requirements for Industry Members Submitting via CAT Reporting Agents

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

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<sup>7</sup> The error rate will be based on validations in effect at the date of required production reporting. For the initial Phase 2a reporting on April 20, 2020, the error rate calculation is equal to the Total Number of Syntax and Semantic Errors divided by Total Submissions. See Table 1.

**Step 1:** Firm and CRA successfully connect to SFTP and/or login to the CAT Reporter Portal Test Environment.

**Step 2:** CAT Reporter has defined one or more CAT Reporting Agent Relationships in the Test Environment.

**Step 3:** Record the CAT Processing Date(s) on which each CRA has successfully submitted a single day of production to the Test Environment on the Industry Member's behalf.

**Table 1: Production Readiness Error Rates**

Production Reporting Phase	Production Readiness Error Rate Based On
Phase 2a Data Integrity Go-live April 20, 2020	Equity Data Integrity Only (Syntax/Semantics)
Phase 2b Data Integrity Go-live May 18, 2020	Options Data Integrity Only (Syntax/Semantics) <i>Note: IMs passing the 2a Production Readiness that are already entitled to the Production Environment do NOT have to re-test for options.</i>
IM Begins Reporting to CAT for the First Time Post Initial Go-live	Validations in effect in the Production Environment when the IM begins reporting to CAT for the first time. <i>Note: Once a CAT Reporter has certified for 2a or 2b, they do not have to recertify for subsequent phases.</i>



## 12. Certification of 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 Helpdesk at 888-696-3348 or [help@finracat.com](mailto:help@finracat.com). The FINRA CAT Helpdesk 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 CAT Production Environment, and a notification confirming access will be sent.