

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

09/15/2020

Version 1.2

Change Log.....	3
Introduction	4
Customer and Account Information System (CAIS) Onboarding Overview	5
Companion Documents.....	6
1. Register for CAIS.....	7
2. Designate CAIS Account Administrator(s)	8
3. Create / Entitle CAT User Accounts for the CAIS Reporter Portal	9
4. Request CAIS Secure File Transfer Accounts.....	11
5. Establish CAIS Reporting Relationships in the Test Environment.....	12
6. Conduct Testing for Production Readiness	13
7. Certify Testing Completion.....	16

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"> • Updated the Onboarding Overview and §7 to reflect that the Production Environment is not available until December. • Updated §1 Registration for CAIS to reflect the collection of approximate number of accounts. • Updated §6 to reflect testing certification expectations.
1.2	09/15/2020	<ul style="list-style-type: none"> • Updated §6 to clarify expectations for self-reporting firms, CAT Reporting Agents, and firms with no account information to be reported.

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>.

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.

Companion Documents

- CAIS Reporter Portal User Guide: <https://www.catnmsplan.com/cais-registration>
- Entitlement Reference Guide for Super Account Administrators:
<http://www.finra.org/sites/default/files/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 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 ID¹
- 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 LTIDs²

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

Organizations may begin submitting the registration form on August 17, 2020. It is recommended that all organizations that need to access CAIS for the submission of LTID data complete the registration form no later than October 5, 2020.

Reporters that are have no accounts with associated LTIDs 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.

¹ 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.

² 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

Two environments are available for CAT Reporters to access: a non-production test environment, often referred to as “Industry Test”, and a production environment. Each user account entitled to access the CAIS Reporter Portal must explicitly be assigned access to the test environment, production environment, or both. A user’s CAT access setting will determine whether the user can access the entitled applications in the test or production environment, or both. For example, a user with CAIS Reporter Portal entitlement and test access will be able to access the CAIS Reporter Portal in the test environment but not in production.

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 §7, 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.

3.2. CAIS Reporter Portal User Types

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

Role	Description
CAIS Reporter Portal	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>
CAIS Reporter User	Allows the user to create, view, and transmit CAIS records; upload files; view status files; view and repair errors; view submission statistics; and manage reporting relationships.
CAIS Reporter Read-Only User	Allows the user to view status files and submission statistics.

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](#)

4. Request CAIS Secure File Transfer Accounts

4.1. SFTP Environments

Two environments are available for CAT Reporters to access: a non-production test environment, often referred to as “Industry Test”, and a production environment. 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, 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.

4.1. 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.

5. Establish CAIS Reporting Relationships in the Test Environment

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 Test Environment. A CAIS Reporter 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](#).

6. Conduct Testing for Production Readiness

Testing certification will open on October 5, 2020.

Industry Members and CAT Reporting Agents are required to perform testing to demonstrate their ability to successfully submit data to CAIS prior to accessing the CAIS production environment. Production readiness testing is limited to the validations in effect when an Industry Member is required to begin reporting data to CAIS. Testing is performed in the CAIS Test Environment, which is production-equivalent. Validations and feedback processes mirror those of the Production Environment. Production readiness testing is limited to the validations in effect when an Industry Member is required to begin reporting data to CAIS. CAT Reporters have no volume limitation and may submit full production-equivalent loads to the Test Environment.

Testing certification begins on October 5, 2020 and must be completed prior to submitting data to the CAIS production environment.

6.1. CAIS 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.

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).

6.2. CAIS 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.

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).

6.3. CAIS Production Readiness Requirements for Firms that Do Not Have Accounts with LTID Associations

Reporters that 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 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 as applicable, per §5, if applicable. This must be completed by the CAT Reporter.

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).

7. 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. 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. **Note that the CAIS Production Environment will be available beginning in December 2020.**