

Small Firm Roadmap to March 17, 2023 - CAT Customer and Account Information System (CAIS)

The purpose of this document is to provide a roadmap to assist Small Firms, defined by CAT as “Small Industry Members” with meeting their Customer and Account Information System (“CAIS”) reporting obligations by the compliance date of March 17, 2023. Specifically, by March 17, 2023, all Industry Members (Large and Small) must be fully compliant with the CAIS reporting obligations set forth in the [CAT Reporting Customer and Account Technical Specifications for Industry Members-Full CAIS](#)¹. Please note that [CAT Alert 2022-01](#), originally published on July 12, 2022, provides additional details related to the Full CAIS Timeline and interim reporting obligations for Industry Members. The Small Firm Roadmap to March 17, 2023, lays out the steps necessary to prepare to submit full Customer and Account information to the CAT Customer and Account Information System.

Step 1: Determine if your firm has an obligation to report Customer and Account information to CAT CAIS.

Industry Members that have an obligation to report equities, options and/or multi-leg transaction events containing the field *firmDesignatedID* (also known as “Firm Designated ID” or “FDID”) to the CAT transaction system also have an obligation to report Customer and Account Information to CAIS. Examples of CAT events requiring an FDID include, but are not limited to, New Order, New Quote, Trade and Order Fulfillment events and Allocation events. Industry Members with such a reporting obligation must proceed to Step 2. Industry Members may contact the FINRA CAT Helpdesk to confirm whether they are reporting events containing an FDID.

Step 2: Register for CAT CAIS.

Each Industry Member submitting CAT CAIS data must submit a [CAT CAIS Registration Form](#). If the firm has already submitted a CAT CAIS Registration Form, there is no need to resubmit a new registration form. Firms may submit a new CAT CAIS Registration Form to amend a prior registration. For example, firms may resubmit the registration form to change the number of estimated accounts it expects to submit to CAIS. Please note that the CAT CAIS Registration Form is separate and distinct from the CAT Transaction Registration Form.

Step 3: Grant CAT CAIS Test Environment Entitlement to personnel within the firm.

Upon registration, the firm’s Super Account Administrator (“SAA”) will be granted Administrator entitlement to the CAIS Reporter Portal Industry Test Environment. The firm’s SAA may grant User entitlement privileges to personnel within the firm that will need access to the CAT CAIS Reporter Portal. More information on granting entitlement and the CAT roles may be found in Section 3.2 of the [Industry Member CAIS Onboarding Guide](#). For information regarding the CAT CAIS Reporter Portal, including how to access it and the functionality it provides, please see the [CAT CAIS Reporter Portal User Guide](#).

¹ The specific Customer and Account attributes required to be reported to CAT CAIS are detailed in the [CAT Reporting Customer and Account Technical Specifications for Industry Members-CCID](#).

Step 4: Determine how the firm will submit data to CAT CAIS.

Industry Members may choose to report CAT CAIS data via the following methods:

1. CAT Reporting Agent
 - a. Enable another CAT Reporting Agent (i.e., clearing firm or service bureau) to submit CAT CAIS data on your behalf
2. Self-Reporting
 - a. Manually enter records into the CAT CAIS Reporter Portal User Interface
 - b. Upload files to the CAT CAIS Reporter Portal or via Private Line/AWS PrivateLink

If you plan to use a CAT Reporting Agent to report data on your behalf, please proceed to Step 5.

If you plan to self-report data, please proceed to Step 6.

Step 5: Establish a CAT CAIS Reporting Relationship with your CAT Reporting Agent in the Test Environment.

1. Log into the [CAT CAIS Reporter Portal Test Environment](#) using your FINRA login credentials (see Step 3).
2. Click on the 'Transaction Data' application in the blue navigation bar on the left side of the screen. Then click on the 'Reporting Relationships' application.
3. Click the 'CAIS Reporting Relationships' tab and click on 'Add new' to enter the relevant information for CAT CAIS Reporting Relationships.
4. Save Changes.

CAIS Reporting Relationships established for LTID reporting do not need to be re-established for Full CAIS reporting.

More information about establishing CAT Reporting Relationships can be found in Section 7 of the [CAT CAIS Reporter Portal User Guide](#).

Step 6: Certify for Full CAIS Production.

Full CAIS Production Certification opened on February 1, 2022. Industry Members must request Full CAIS Production certification no later than July 25, 2022, to allow sufficient time to complete all onboarding steps.

Section 7 of the [Industry Member CAIS Onboarding Guide](#) details the specific requirements for self-reporting firms and firms using a CAT Reporting Agent.

I. SELF-REPORTING FIRMS ONLY - Please see Section 7.1 of the [Industry Member CAIS Onboarding Guide](#) for specific requirements for self-reporting firms.

II. FIRMS USING A CAT REPORTING AGENT ONLY

(A) When your CAT Reporting Agent has successfully certified for CAIS production, contact the FINRA CAT Helpdesk to request certification for your firm. The Industry Member will need to confirm that all of its CAT Reporting Agents have certified for CAIS production reporting.

(B) Grant CAT CAIS Production Environment Entitlement to personnel within the firm
Upon certification, the firm's Super Account Administrator ("SAA") will be granted Administrator entitlement to the CAIS Reporter Portal Production Environment. The firm's SAA may grant User entitlement privileges to personnel within the firm that will need access to the CAT CAIS Reporter Portal. More information on granting entitlement and the CAT roles may be found in Section 3.2 of the [Industry Member CAIS Onboarding Guide](#).

(C) Establish a CAT CAIS Reporting Relationship with your CAT Reporting Agent(s) in the **Production Environment**.

1. Log into the [CAT CAIS Reporter Portal Production Environment](#) with your FINRA login credentials (see Step 3).
2. Click on the 'Transaction Data' application in the blue navigation bar on the left side of the screen. Then click on the 'Reporting Relationships' application.
3. Click the CAIS Reporting Relationships tab and click on 'Add new' to enter the relevant information for CAT CAIS Reporting Relationships.
4. Save Changes.

CAIS Reporting Relationships established for LTID reporting do not need to be re-established for Full CAIS Reporting.

More information about establishing CAT Reporting Relationships can be found in Section 7 of the [CAT CAIS Reporter Portal User Guide](#).

For additional assistance or questions, please contact the CAT Helpdesk at 888-696-3348 or help@finracat.com.