

## Reference Database Reporting: Transition to Schema Version 1.0.0

1.	<b>Revisions Summary</b> .....	1
2.	<b>Summary</b> .....	1
3.	<b>Phase 1A and Phase 1B Scope</b> .....	3
4.	<b>Phase 1A Schema Updates</b> .....	4
5.	<b>Phase 1B Schema Updates</b> .....	5
6.	<b>Transition Plan Overview</b> .....	7
7.	<b>Feedback and Rejection Repair During the Transition</b> .....	9
8.	<b>Other Updates</b> .....	9
9.	<b>Transition Resources</b> .....	9

### 1. Revisions Summary

Version	Publish Date	Description
1.0	03/27/2026	Initial publication.
1.1	05/08/2026	<p>Changes to conform with the March 27, 2026 SEC Order Approving Proposed Amendment:</p> <ul style="list-style-type: none"> <li>• Include reference to the Amendment</li> <li>• Note that the periodic refresh requirement was eliminated and FDID Refresh Reports will be disabled at a future to-be-determined date</li> <li>• Add that the following fields will be made Optional in Phase 1A and will be removed from the schema in Phase 1B:                             <ul style="list-style-type: none"> <li>○ <i>largeTraderList</i></li> <li>○ <i>largeTraderRecordID</i></li> <li>○ <i>largeTraderID</i></li> <li>○ <i>ltidEffectiveDate</i></li> <li>○ <i>ltidEndDate</i></li> <li>○ <i>ltidEndReason</i></li> <li>○ <i>lei</i></li> </ul> </li> </ul>

### 2. Summary

On January 13, 2026, the SEC approved an [amendment](#) to the CAT NMS Plan relating to the Customer and Account Information System (“CAIS”). Effective with the amendment, CAIS has been renamed as the Reference Database.

On March 27, 2026, the SEC approved another [amendment](#) to the CAT NMS Plan that included additional changes to the Reference Database.

This CAT Alert addresses the Industry Member impacting items in the January 13, 2026 and March 27, 2026 amendments (collectively, Amendments).<sup>1</sup>

The Amendments eliminate Industry Member requirements to report Customer names, Customer addresses, account names, account addresses, years of birth, authorized trader names, large trader/unidentified large trader information, Legal Entity Identifiers (“LEIs”) and Employer Identification Numbers (“EINs”); and eliminates the requirements relating to inconsistencies and periodic refresh requirements<sup>2</sup>.

Industry Members have requested a six-month phase-in period during which Industry Members will be permitted to continue reporting names, addresses, years of birth, large trader/unidentified large trader information, LEIs and EINs to CAT, in order to develop, test and implement the necessary changes to firm systems to comply with the Amendments. Based on this feedback, changes will be implemented in two phases. In Phase 1A, Industry Members and CAT Reporting Agents are permitted to report names, addresses, years of birth, large trader/unidentified large trader information, LEIs, EINs and the *updateNotification* field (relating to the handling of inconsistencies). If an Industry Member continues to report these fields in Phase 1A, FINRA CAT will implement system changes that prevent this data from being persisted through the system. In Phase 1B, any submissions from Industry Members and CAT Reporting Agents that include names, addresses, years of birth, large trader/unidentified large trader information, LEIs, EINs and the *updateNotification* field will be rejected.

This CAT Alert describes how Industry Members transition to the Reference Database reporting requirements, including the timeline for the transition. Phase 1A will be deployed to the Industry Test Environment on June 29, 2026 and to the Production Mirror and Production Environments on July 27, 2026. Phase 1B will be deployed to the Industry Test Environment on September 28, 2026 and to the Production Mirror and Production Environments on December 7, 2026.

Industry Members that submit customer and account reference data on a daily basis or on an as-required basis (“delta submitters”) will not be required to make full resubmissions to the Reference Database.

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<sup>1</sup> This CAT Alert only addresses changes related to reporting to the CAT and does not address any requirement an Industry Member may have to collect and retain the information discussed in this Alert pursuant to any other regulatory or other requirement.

<sup>2</sup> Previously, under the SEC’s February 10, 2025 exemption order, Industry Members were permitted to discontinue reporting names, addresses, and years of birth for natural persons, but not prohibited from continuing to report such information if they so choose. See CAT Alert 2025-02 (Feb. 24, 2025) (providing guidance for how Industry Members may elect to stop reporting such information to CAT).

### 3. Phase 1A and Phase 1B Scope

#### Phase 1A

In Phase 1A, fields related to the reporting of names, addresses, years of birth, large trader/unidentified large trader information, LEIs, EINs and the inconsistency resolution process (i.e., *updateNotification*) will be made optional. See Table 1 for a list of optionally reportable fields. While these fields may continue to be optionally reported in Phase 1A, FINRA CAT will no longer validate these fields and related data validations will be disabled. While data validations on the fields identified in Table 1 will be disabled, all files must still pass File Integrity, including validation for valid JSON format and parsing rules.

Effective with the deployment of Phase 1A, Industry Members will not be required to repair any outstanding rejections related to names, addresses, years of birth, large trader/unidentified large trader information, plaintext LEIs, plaintext EINs and *updateNotification*. See Appendix B of the Reference Database Technical Specifications for the retired error codes. Similarly in Phase 1B, Industry Members will not be required to repair those rejections as those outstanding rejections related to these fields will be automatically reconciled in Phase 1B (i.e., Industry Members will not have to take any action to repair them).

Also, in Phase 1A, *updateNotification* will be made optional and this field will not be processed by the Reference Database. Effective with the deployment of Phase 1A, Industry Members will not be required to resolve any outstanding Material Inconsistencies. In Phase 1B, Outstanding Material Inconsistencies Feedback will be permanently disabled.

Compliance with the Periodic Customer & Account Reference Data Refresh requirement had been delayed pending proposed amendments to the CAT NMS Plan. The March 27, 2026 amendment permanently eliminates the requirement that the Plan Processor have a process to periodically receive full account lists to ensure completeness and accuracy of the account database. Effective with the amendment, compliance with the Periodic Customer & Account Reference Data Refresh has been eliminated. The FDID Refresh Report will continue to be generated and posted, however, Industry Members are still not required to submit the FDIDs on the FDID Refresh Report in order to comply with the periodic refresh requirement. At a future to-be-determined date, the FDID Refresh Report will be disabled. As a result, 'INACTIVE' will be removed as an allowable value for *fdidEndReason* and *roleEndReason* in Phase 1B.

#### Phase 1B

Prior to the implementation of Phase 1B, Consolidated Audit Trail, LLC will publish an updated Reference Database Technical Specifications and accompanying schema (version 1.0.0) that will describe the updated Reference Database reporting requirements. In Phase 1B, fields related to the reporting of names, addresses, years of birth, large trader/unidentified large trader information, plaintext LEIs, plaintext EINs and

the inconsistency resolution process (i.e., *updateNotification*) will be removed from the schema as will the End Reason value of 'INACTIVE', and will reject if submitted to the Reference Database. Thus, while coding for Phase 1A is optional, all Industry Members and CAT Reporting Agents must make coding changes in preparation for the deployment of Phase 1B. See Table 2 for more information regarding the updated schema.

Additionally, Industry Members and CAT Reporting Agents must make note of the following effective December 7, 2026 in the Production Environment:

- Only files properly formatted for Reference Database schema *version* 1.0.0 will be accepted.
- Only properly named Reference Data Files will be accepted. The only acceptable value for File Kind will be 'REF'. There are no changes to the Transformed Identifiers Filename.
- For SFTP submitters, submissions must be posted to `/submitterID/cat/ref/upload`

#### 4. Phase 1A Schema Updates

Phase 1A includes modifications to the Reference Data File (formerly CAIS Data File) schema. Table 1 lists the fields that are Required or Conditional under schema version 2.0.0 that will be made Optional in Phase 1A. Further information can be found in version 2.4.0 of the [Reference Database Technical Specifications](#).

There are no changes to the Transformed Identifiers File schema in Phase 1A.

Table 1: Summary of Reference Data File Updates for Phase 1A

Phase 1A (Schema version 2.0.0)			
JSON Object Level	Field Name	Change Description	Update
FDID Record	<i>accountName</i> <i>addressList</i> <i>addrType</i> <i>addrLine1</i> <i>city</i> <i>regionCode</i> <i>countryCode</i> <i>postalCode</i> <i>largeTraderList</i> <i>largeTraderRecordID</i> <i>largeTraderID</i> <i>ltidEffectiveDate</i> <i>ltidEndDate</i> <i>ltidEndReason</i> <i>authTraderNamesList</i> <i>authTraderNameID</i> <i>authTraderName</i>	Include Key	Changed to Optional

Phase 1A (Schema version 2.0.0)			
JSON Object Level	Field Name	Change Description	Update
<b>Natural Person Customer Record</b>	<i>firstName</i> <i>lastName</i> <i>doingBusinessAs</i> <i>yearOfBirth</i> <i>addressList</i> <i>addrType</i> <i>addrLine1</i> <i>city</i> <i>regionCode</i> <i>countryCode</i> <i>postalCode</i> <i>updateNotification</i>	Include Key	Changed to Optional
<b>Legal Entity Customer Record</b>	<i>legalName</i> <i>addressList</i> <i>addrType</i> <i>addrLine1</i> <i>city</i> <i>regionCode</i> <i>countryCode</i> <i>postalCode</i> <i>ein</i> <i>lei</i> <i>updateNotification</i>	Include Key	Changed to Optional

## 5. Phase 1B Schema Updates

The transition from Phase 1A to Phase 1B includes further modifications to the Reference Data File. Table 2 summarizes the changes and shows:

- That *version* will be updated from 2.0.0 (Full CAIS schema) to 1.0.0 (Reference Database schema).
- The list of fields that are Required or Conditional under schema version 2.0.0 that will be removed from the schema in version 1.0.0.
- That *fdidEndReason* and *roleEndReason* of 'INACTIVE' will be removed from the schema in version 1.0.0.

An updated version of the Reference Database Technical Specifications and accompanying schema will be published prior to Phase 1B.

The Transformed Identifiers File schema will also be updated to reflect a *version* of 1.0.0. There are no other Transformed Identifiers File schema updates in Phase 1B.

Industry Members and CAT Reporting Agents may optionally report to the Reference Database by omitting the fields identified for removal in Table 2 in Phase 1A because, in Phase 1A, validations on these fields will

be disabled. However, note that during Phase 1A, the only allowable value for *version* in the file header is '2.0.0'. Effective with the deployment of schema version 1.0.0, the only allowable value for *version* in the file header is '1.0.0'.

Table 2: Summary of Reference Data File Updates for Phase 1B

Phase 1B (schema version 1.0.0)			
JSON Object Level	Field Name	Change Description	Update
<b>Main</b>	<i>version</i>	Accepted Value	New Accepted Value 1.0.0
<b>FDID Record</b>	<i>accountName</i> <i>addressList</i> <i>addrType</i> <i>addrLine1</i> <i>addrLine2</i> <i>addrLine3</i> <i>addrLine4</i> <i>city</i> <i>regionCode</i> <i>countryCode</i> <i>postalCode</i> <i>largeTraderList</i> <i>largeTraderRecordID</i> <i>largeTraderID</i> <i>ltidEffectiveDate</i> <i>ltidEndDate</i> <i>ltidEndReason</i> <i>authTraderNamesList</i> <i>authTraderNameID</i> <i>authTraderName</i>	Field Removal	Fields removed from the schema
	<i>fdidEndReason</i> <i>roleEndReason</i>	Allowable Value Removed	"INACTIVE" removed from the schema
<b>Natural Person Customer Record</b>	<i>firstName</i> <i>middleName</i> <i>lastName</i> <i>nameSuffix</i> <i>doingBusinessAs</i> <i>yearOfBirth</i> <i>addressList</i> <i>addrType</i> <i>addrLine1</i> <i>addrLine2</i> <i>addrLine3</i> <i>addrLine4</i> <i>city</i> <i>regionCode</i> <i>countryCode</i> <i>postalCode</i> <i>updateNotification</i>	Field Removal	Fields removed from the schema

Phase 1B (schema version 1.0.0)			
JSON Object Level	Field Name	Change Description	Update
Legal Entity Customer Record	<i>legalName</i> <i>addressList</i> <i>addrType</i> <i>addrLine1</i> <i>addrLine2</i> <i>addrLine3</i> <i>addrLine4</i> <i>city</i> <i>regionCode</i> <i>countryCode</i> <i>postalCode</i> <i>ein</i> <i>lei</i> <i>updateNotification</i>	Field Removal	Fields removed from the schema

## 6. Transition Plan Overview

The Reference Database Industry Test Environment (“Test Environment”), Reference Database Production Mirror Environment (“Prod Mirror Environment”) and Reference Database Production Environment (“Production Environment”) are used in concert to facilitate efficient testing for Industry Members and CAT Reporting Agents.

Prior to 8 am Eastern Time on June 29, 2026, Industry Members and CAT Reporting Agents must report to all Reference Database environments according to schema version 2.0.0, including reporting Replacement Field Values as described in [CAT Alert 2025-02](#). All required and conditionally required fields must be included in the submission.

### Phase 1A Deployment

As detailed in Section 3 and Section 4 of this CAT Alert, in Phase 1A, Industry Members and CAT Reporting Agents continue to report to the Reference Database using schema version 2.0.0 (including those Industry Members and CAT Reporting Agents reporting according to the SEC’s February 10, 2025 [order](#) and using the Replacement Field Values described in [CAT Alert 2025-02](#)). The required and conditionally required fields identified in Table 1 may be optionally submitted.

At approximately 8 am Eastern Time on June 29, 2026, the Phase 1A schema will be deployed to the Test Environment. All required and conditionally required fields must continue to be submitted to the Prod Mirror and Production Environments.

At approximately 8 am Eastern Time on July 27, 2026, Phase 1A will be deployed to the Prod Mirror and Production Environments. The fields identified in Table 1 may be optionally submitted.

**Phase 1B Deployment**

As detailed in Section 3 and Section 5 of this CAT Alert, in Phase 1B, Industry Members and CAT Reporting Agents must use schema version 1.0.0 (files reported in version 2.0.0 will be rejected). The fields and field values identified in Table 2 (other than *version*) will cause rejections if submitted.

At approximately 8 am Eastern Time on September 28, 2026, Phase 1B will be deployed to the Test Environment. Submissions to the Prod Mirror and Production Environments must continue to be in version 2.0.0 (files submitted in version 1.0.0 will be rejected). **Industry Members and CAT Reporting Agents conducting testing for Production Readiness must submit to the Reference Database in schema version 1.0.0 in order to certify.**

Effective at approximately 8 am Eastern Time on December 7, 2026, Phase 1B will be deployed to the Prod Mirror and Production Environments. Industry Members and CAT Reporting Agents reporting to any environment must use schema version 1.0.0 (all other schema versions will be rejected).

Table 3 summarizes the deployment schedule for each phase and identifies the schema (version 2.0.0 or version 1.0.0) accepted in each environment.

Table 3: Summary of Deployment Schedule in Each Environment

	Until ~ 8 am ET on June 29, 2026	~ 8 am ET on June 29, 2026 – July 27, 2026	~ 8 am ET on July 27, 2026 – September 28, 2026	~ 8 am ET on September 28, 2026 – December 7, 2026	~ 8 am ET on December 7, 2026 and beyond
Environment	Acceptable Schema	Acceptable Schema(s)	Acceptable Schema(s)	Acceptable Schema(s)	Acceptable Schema
Industry Test Environment	Spec version 2.2.0 r4 Schema version 2.0.0	<b>Phase 1A:</b> Spec version 2.3.0 Schema version 2.0.0	<b>Phase 1A:</b> Spec version 2.3.0 Schema version 2.0.0	<b>Phase 1B:</b> Spec version 1.0.0 Schema version 1.0.0	<b>Phase 1B:</b> Spec version 1.0.0 Schema version 1.0.0
Prod Mirror Environment	Spec version 2.2.0 r4 Schema version 2.0.0	Spec version 2.2.0 r4 Schema version 2.0.0	<b>Phase 1A:</b> Spec version 2.3.0 Schema version 2.0.0	<b>Phase 1A:</b> Spec version 2.3.0 Schema version 2.0.0	<b>Phase 1B:</b> Spec version 1.0.0 Schema version 1.0.0
Production Environment	Spec version 2.2.0 r4 Schema version 2.0.0	Spec version 2.2.0 r4 Schema version 2.0.0	<b>Phase 1A:</b> Spec version 2.3.0 Schema version 2.0.0	<b>Phase 1A:</b> Spec version 2.3.0 Schema version 2.0.0	<b>Phase 1B:</b> Spec version 1.0.0 Schema version 1.0.0

## 7. Feedback and Rejection Repair During the Transition

Feedback will be provided in the schema version accepted in each environment. Thus, when version 1.0.0 is deployed to the Test Environment, feedback will be provided in version 1.0.0; and when version 1.0.0 is deployed to the Prod Mirror and Production Environments, feedback will be provided in version 1.0.0.

Repair of rejections must be submitted in a file formatted for the version accepted in each environment. For example, if a submission is made to the Test Environment on October 1, 2026, resulting in rejections and the Industry Member repairs the rejections on October 2, 2026, the file must be formatted for schema version 1.0.0.

## 8. Other Updates

Also, in Phase 1B, FINRA CAT will make other changes that affect Industry Members and CAT Reporting Agents:

- The File Kind in the Reference Data Filename will be updated:
  - File Kind set to 'CAIS': The new File Kind will be 'REF'
    - <CAT Submitter ID>\_<CAT Reporter CRD>\_<File Generation Date>\_<Group>\_<File Kind>\_<File Number>.<Format Extension>.<Compression Extension>

For example: 123\_999\_20270101\_REF\_000123.json.bz2
- The SFTP Directories for submission and feedback will be updated:
  - /submitterID/cat/cais/upload: The new directory will be located at /submitterID/cat/ref/upload
  - /submitterID/cat/cais/feedback: The new directory will be located at /submitterID/cat/ref/feedback
- Appendix E will be updated to remove the Postal Code Formatting, Region Code and Region Description information.

## 9. Transition Resources

- [Reference Database Technical Specifications](#)
- [Reference Database Reporting Scenarios](#)
- [Reference Data File Schema](#)
- [TIDS Schema](#)