# T+2 SETTLEMENT

Shortened Settlement Cycle | What You Need To Know

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# Chronology

#### 1995

• The last time the U.S. settlement cycle was shortened was in 1995, when it changed from T+5 to T+3.

#### · 2014

- O Most European Union member states harmonized their settlement cycles to T+2 in 2014. Other major markets in the Asia/Pacific region are already on T+2 or T+1.
- Following an analysis of the potential benefits of a move to T+2, the Investment Company Institute (ICI), Association of Global Custodians and SIFMA endorsed a move to a shorter settlement cycle.
- Representatives from the industry, including SIFMA, DTCC, and ICI, then established an industry steering committee ("ISC"), comprised of about twenty participants across key market segments, as a governing body to oversee the shortened settlement cycle initiative on behalf of the industry. The ISC identified members of an industry working group ("IWG") of over 300 experts to assist in the initiative.

#### • **2015**

In response to a request from then Securities and Exchange Commission Chair White, SIFMA and ICI commissioned Deloitte & Touche LLP to work with the ISC and develop a playbook detailing the requested information (the "Playbook"). The Playbook identified remedial activities in which affected market participants needed to engage to prepare for and implement the requirements of a T+2 settlement environment.

#### · 2016

- The relevant regulators provided regulatory certainty as to the move to a shorter settlement cycle though proposing changes to relevant rules, including the SEC proposing a change to the keystone settlement rule, Rule 15c6-1.
- Based on a thorough analysis, the industry identified **Tuesday, September, 5,** as the least-risky day for a transition to a shorter settlement cycle.



#### September 5, 2017 Conversion

What is Happening Tuesday, September 5, 2017?

Shortening the securities settlement cycle from trade date plus three days (T+3) to trade date plus two days (T+2) North America-Wide
 Tuesday, September 5, 2017 will be the first trade date on which an

Tuesday, September 5, 2017 will be the first trade date on which an executed trade will settle trade date plus two days (T+2) later "regular way."

• On <u>Thursday, September 7</u>, the last trades that settle on a T+3 basis and the first trades settling on a T+2 basis will settle on the same day – a double settlement day.

 Product Scope – generally equity and fixed income securities, and products comprised of those securities.

#### $\circ$ Why T+2?

- <u>Risk Reduction</u> Risk is a function of time. Fewer days, less risk.
- <u>Capital Efficiency</u> central counterparty margin reduction allows firms to put capital to better use
- <u>Process Efficiency</u> Firms are using the move to a shorter settlement cycle to lean batch processes and improve straight though processing.
- Global Harmony the move to T+2 will align North America with other major global markets that currently operate in T+2.





# What You Should be Doing Today

#### Communication

- Ensure Service Provider Readiness
- Update web pages
- Consider adding a message on client statements
- Adding T2 recoding to call center lines
- Train Help Center staff on implications of T+2

# **System Readiness**

- Working with your IT teams to ensure readiness and migration weekend activities
- The industry is planning on falling forward what are your service provider plans in case an issue arises



#### **T+2** Implementation Activities

■ Finalizing Migration weekend run book, call tree and other T2 migration activities



#### Communication

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T+2 Implementation Activities
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# <u>Communication with your Service Providers –</u> "Are we ready?":

- What are your communication and conversion period plans?
- Do you have new cash processes (purchases)?
- Are there new Service Level Agreements that I need to be aware of due to this change?

# <u>Communication to your customers (internal and external) – "What may change?"</u>

- Is our operations staff (internal customers) aware of procedural updates?
- Cash and funding requirements (check processing) may require modifications
- Corporate Action entitlement dates are shortening (ex date changes)

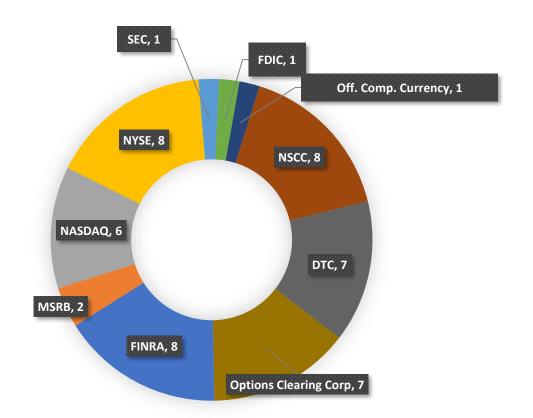


# **US** Rules and Regulations

- On March 22, 2017, the SEC amended Exchange Act Rule 15c6-1 to shorten the standard settlement cycle to T+2.
- Subsequently, nine SROs have changed 48 of their own rules, falling into a number of categories:
  - Dates by which to take certain corporate or other actions
  - Changes to processes associated with settlement
  - Confirmation/affirmation
- The Office of the Comptroller of the Currency and the FDIC have rules still "in analysis" the Comptroller released guidance saying that regulated entities (e.g., custody banks) should conform their actions with the amended settlement cycle, pending expected adoption of confirming rule amendments.
- Certain rules are affected by the change in the settlement cycle, even though the rules themselves have not been changed, including:
  - Reg SHO
  - Reg T (See FINRA Extension Process Changes Regulatory Notice 17-12)
  - Other processes
- The migration/effective date across the industry, for all rule changes, is <u>September 5, 2017</u> –
  don't anticipate relief from the SEC or other regulators.



# **US Rules and Regulations**



Regulator	Rule Changes
FINRA	8
MSRB	2
NASDAQ	6
NYSE	8
SEC	1
FDIC	1 (in analysis)
Off. Comp. Currency	1 (guidance issued)
NSCC	8
DTC	7
Options Clearing Corp	7
<b>Grand Total</b>	49

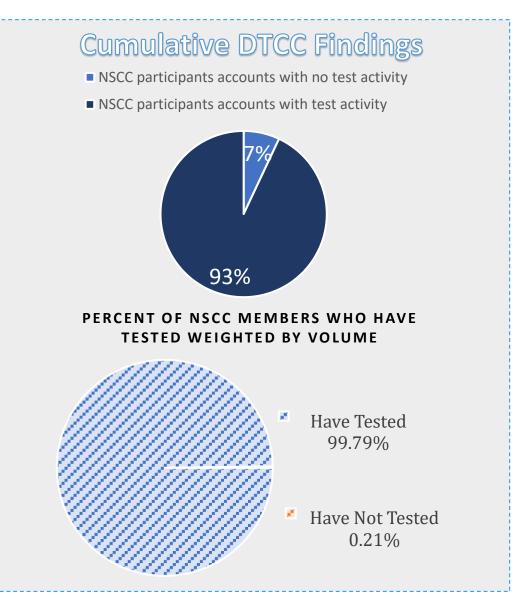
#### **Links to US Rule Set**

US - <a href="http://www.ust2.com/pdfs/SIFMA-WFG-SSC-Rule-Changes-20170707.pdf">http://www.ust2.com/pdfs/SIFMA-WFG-SSC-Rule-Changes-20170707.pdf</a>



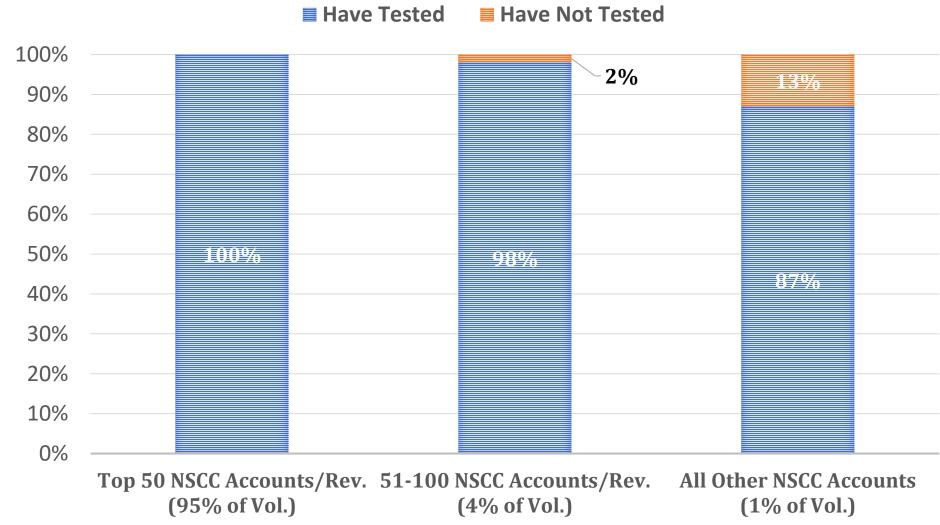
# **Testing**

- Internal Testing
- Counterparties
- Vendors and Service Providers
- Clearing Firms and Custody Banks
- Industry Testing
  - □ Testing Cycles 1-14
  - **□** Corporate Actions
  - □ Double Settlement
  - □ Findings



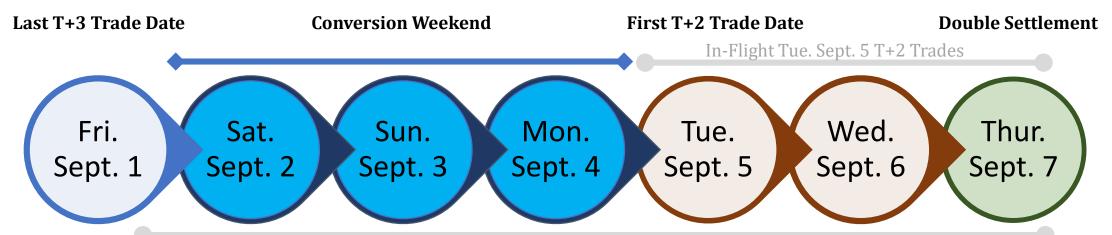


# Testing





# **Conversion Period Support**



#### **Goal/Objective**

Ensure a smooth conversion to T+2 settlement by executing a clear and transparent conversion period support plan, which will include the regular communication of critical status information, transparency into the activity of other participants, and issue identification, escalation and resolution.

In-Flight Fri. Sept. 1 T+3 Trades

#### **Elements**

- Contact List Quick Access to Key Industry and Market Infrastructure Staff
- Bridge Line Single Open Line for Industry Communications with Scheduled Rally-Times
- Communication Hub Staffed Touch-Point for Official Project Information
- Shared Site Live Status, Contacts and Issue Tracking Information
- Issue Tracking Provide Structured Issue Intake, Escalation and Resolution
- Activity Schedule Track Major Milestones and Know What Comes Next
- Success Criterion Develop, Track and Analyze Metrics for Project Success



# **Industry Call Schedule**

	Fri. Sept. 1	Sat. Sept. 2	Sun. Sept. 3	Mon. Sept. 4	Tue. Sept. 5	Wed. Sept. 6	Thu. Sept. 7	Fri. Sept. 8
MKT Status	Open   T+3	Closed	Closed	Closed	Open   T+2	Open   T+2	Open   T+2 (Double)	Open   T+2
Call	Checkpoint	Checkpoint	Checkpoint	Checkpoint	Bridge   Checkpoint	Bridge   Checkpoint	Bridge Line	Checkpoint
Time ET	4:30 -5:30pm	9:00 – 10:00am	9:00 – 10:00am	9:00 – 10:00am 4:30 – 5:30pm	7:00 am – 5:30pm	7:00 am – 5:30pm	7:00 am – 9:00am 1:00 – 2:00pm	9:00 – 10:00am
7:00 am								
8:00 am								
9:00 am		9:00 am	9:00 am	9:00 am	8:30 am 9:30 am	8:30 am 9:30 am	7:00	9:00 am
10:00 am		10:00 am	10:00 am	10:00 am			7:00am – 12:00pm	10:00 am
11:00 am					7:00am	7:00am	3 I	
12:00 pm								
1:00 pm					2:00 pm 3:00 pm	2:00 pm 3:00 pm	1:00 pm	
2:00 pm					2:00 pm	2:00 pm	2:00 pm	
3:00 pm					3:00 pm	3:00 pm		
4:00 pm								
5:00 pm	4:30 pm 5:30 pm			4:30 pm 5:30 pm	4:30 pm 5:30 pm	4:30 pm 5:30 pm		
6:00 pm					3.30 pm			12
7:00 pm								12

#### **Contact List**

Area	Name	Company	Email	Work #	Cell #
Command Center	Will Leahey	SIFMA	wleahey@sifma.org	212.313.1127	-
Command Center	Tom Price	SIFMA	tprice@sifma.org	212.313.1260	-
Command Center	John Abel	DTCC	jabel@dtcc.com	212.855.8434	-
Command Center	Marty Burns	ICI	mburns@ici.org	202.326.5980	-
Command Center	Ahmed El Ghazaly	ICI	Ahmed@ici.org	202.216.2923	-
Broker Dealer	John Smith	XYZ Brokerage	jsmith@xyz.com	555.555.5555	555.555.5556
Clearing Firm	Jane Doe	ABC Clearing	Jdoe@abcclearing.com	444.444.4444	444.444.4445
Custody Bank	Zhao Liu	Alpha Custody	Zliu@alpha.com	333.333.3333	333.333.3334
Asset Manager	Jan Jansen	First Investing	JJansen@first.com	222.222.2222	222.222.2223

**Ask:** to receive critical communications from the Command Center during the conversion period, please send your T+2 Project Manager's Contact Information to will Leahey: <a href="wdeahey@sifma.org">wdeahey@sifma.org</a>

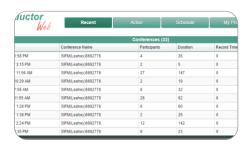
#### Command Center Escalation and Resolution

# Suggested Issue Intake Issue Resolution Command Center **Analysis**

# Socialization









# Bridge Line / Communication Hub / Shared Site



# Bridge Line

- Single open conference line for industry communications
- Scheduled rally-times based on high activity



#### **Communication Hub**

- Staffed touch-point for official project information
- Issue intake and escalation point
- Project Manger Contact List



#### **Shared Website**

- Live status, contacts and issue tracking information
- Helpful links to other Command Center resources



# Corporate Actions & T+2

- Corporate Action Processing Changes
  - Ex-Dates
  - Cover/Protect Date Calculations
  - Dividend Reinvestment Programs (DRIPs)
  - Liability Notices
- What to Know
  - 9/5 will not be ruled an Ex-date
  - Events post 9/5 already exist with new logic
  - Watch Areas



#### Items to Consider

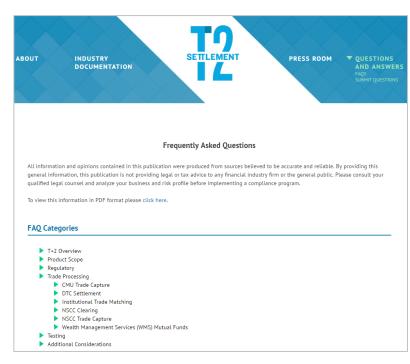
# Sell side / Buy side tips or issues to consider

- ETF Primary Market Create/Redeem Process
- Securities Lending
  - Recall period shortening to match settlement
  - Master Securities Lending Agreement (MSLA)
- Standing Settlement Instructions (SSIs)
- Testing with Service Providers and Custodians
- Same Day Affirmation as Best Practice

#### Other FAQs

- Agency CMOs
- Regulation SHO
- Equity Derivatives

#### http://www.ust2.com/questions/





# Questions?

