NFA's Swaps Proficiency Requirements Webinar

January 28, 2020

Christie Hillsman: Hello, everyone, and welcome to NFA's Swaps Proficiency Requirements webinar. My name is Christie Hillsman, and I'm the Manager in NFA's Communications department. Presenting with me today are Jennifer Sunu, Director of Futures Compliance; and Sudhir Jain, Director of OTC Derivatives.

Last week, NFA's Swaps Proficiency Requirements launched and became accessible online. During today's webinar, we will discuss the Swaps Proficiency Requirements. Note, this webinar is geared toward those taking the Swaps Proficiency Requirements, as well as firms' legal and compliance staff. NFA previously held webinars for Swaps Proficiency Requirements administrators or SPR admins. You can find an archive of those webinars linked on NFA's SPR Admin web page.

Following our prepared remarks today, we've allocated ample time to answer your questions. To ask a question, locate the box labeled "Ask a Question" on the left side of your webinar screen. Type in your question and click "Send." We are able to see questions as they are submitted, and you can submit your questions at any time during today's webinar. For questions that are firm-specific, we will reach out to you individually following our presentation. Additionally, a recording of today's webinar, along with a written transcript, will be on NFA's website in the coming weeks. There's no need to take detailed notes throughout this presentation.

Before I turn it over to our presenters, I'd like to begin with just a brief discussion of why NFA is implementing these Requirements. Section 17(p) of the Commodity Exchange Act requires NFA to establish training standards and proficiency testing for persons involved in the solicitation of transactions subject to the provisions of the act and supervisors of such persons. This provision of the act is not limited to those who are required to be registered as APs.

In February 2018, NFA's Board of Directors determined that similar to Futures and Forex APs, APs engaging in swaps activities at FCMs, IBs, CPOs, and CTAs or Swap Intermediaries, as well as individuals acting as APs at swap dealers; should be required to meet a minimum proficiency standard. Accordingly, NFA is imposing Swaps Proficiency Requirements that test both market knowledge, and knowledge of regulatory requirements involving swaps activities. In order to do so, in May 2018, NFA's Board approved the formation of a Swaps Proficiency Requirements Advisory Committee composed of industry experts from the various registration categories that will be impacted by these requirements. Since its inception, this Committee has worked closely with staff to advise and assist in the development and implementation of these Requirements.

Now, I'll turn it over to Jennifer to discuss the NFA rules related to the Swaps Proficiency Requirements.

Jennifer Sunu: Thanks, Christie. As Christie mentioned, the Swaps Proficiency Requirements are now available online. NFA Bylaw 301(l) and NFA Interpretive Notice 9075, which addresses proficiency requirements for swap APs, provides that beginning January 31, 2021, any individual applying for approval as an FCM, IB, CPO, or CTA Member swap firm, or a swap associated person, must take and pass NFA's Swaps Proficiency Requirements to receive approval as a swap firm or swap associated person. NFA Compliance Rule 2-24 prohibits a swap intermediary from having associated with it any person engaging in swap activity who has not satisfied the Requirements after January 31, 2021. Therefore, individuals who are currently approved as swap APs at Member firms have until January 31, 2021, the Compliance Date, to satisfy NFA's Swaps Proficiency Requirements in order to continue engaging in swaps activity.

Regarding individuals acting as APs at swap dealers, beginning January 31, 2021, NFA Compliance Rule 2-24 and NFA Interpretive Notice 9075 prohibit a swap dealer from having associated with it any person who is an associated person as defined in CFTC Regulation 1.3, who has not satisfied NFA's Swaps Proficiency Requirements. This provides current registered APs engaging in swaps activities and individuals acting as APs at swap dealers an entire year to complete the Requirements. Please note that individuals subject to the Requirements who become employed by an NFA Member firm any time prior to the January 31, 2021 Compliance Date, must also satisfy the Swaps Proficiency Requirements by that date. After January 31, 2021, any individual who wants to engage in swaps activity will need to satisfy NFA's Swaps Proficiency Requirements prior to being approved as a swap AP at a swap intermediary, or acting as an AP at a swap dealer.

Non-U.S. domiciled individuals acting as APs at swap dealers are only required to satisfy the Swaps Proficiency Requirements if they do business with U.S. persons. If these individuals limit their activities to non-U.S. persons or non-U.S. branches of swap dealers, they are not required to satisfy NFA's Swaps Proficiency Requirements. The framework for the exclusion of certain non-U.S. APs is described in more detail in the Swaps Proficiency Requirements FAQs found on NFA's website.

I will now turn it over to Sudhir to provide an overview of the setup and administration of the Swaps Proficiency Requirements.

Sudhir Jain: Thank you, Jennifer. There are two proficiency tracks that may be completed to satisfy the Swaps Proficiency Requirements, the Long Track and the Short Track. Each track consists of a series of modules, each with a training and testing component. The Long Track consists of eight modules and a total of 100 test questions, and is estimated to take approximately eight hours to complete. The Short Track consists of four modules and a total of 60 test questions, and will take approximately four hours to complete. I should point out that the total time for completion includes both the training and testing components. Every module within a track is a different length. So each module may take anywhere from 30 minutes to 90 minutes to complete.

The modules in the Long Track cover the following topics: Swap Products and Applications, Regulation of the Swaps Market, Onboarding, Transactional Disclosures, Anti-Fraud and Ethical Practices, Trade Execution, Clearing and Margin, Risk Management, and Supervision. The Short Track covers a subset of what is in the Long Track, plus a Compliance, Anti-Fraud, and Other Requirements module geared toward swap APs at intermediaries. The topics covered in the Swaps Proficiency Requirements are also listed in NFA's FAQs.

In general, the Short Track is designed for APs at FCMs, IBs, CPOs, and CTAs, and individuals responsible for supervising them. The Long Track is designed for APs at swap dealers and individuals responsible for supervising them. However, swap dealers with individuals acting as APs who are not in swap dealers' sales and trading areas and who do not negotiate price and/or execute swaps with counterparties on behalf of the swap dealer, or manage the swap dealer's swap-related risks, have the option of allowing those individuals to satisfy either the Long Track or the Short Track. Similarly, for individuals supervising persons designated as APs, but engaged in activities that do not involve sales and trading activities, the swap dealer has the option of requiring those individuals to take the Long Track or the Short Track.

An individual who passes the Short Track, but moves into a role requiring completion of the Long Track, may satisfy the Swaps Proficiency Requirement by completing the remaining modules in the Long Track. These individual's firms may contact NFA's Information Center to receive access to the outstanding modules in the Long Track. Finally, an individual who is an AP of a swap dealer who is also a designated swap AP at an FCM, IB, CPO, or CTA must successfully complete the Long Track in order to satisfy NFA's Swaps Proficiency Requirements, if the swap dealer requires that individual to satisfy the Long Track. An individual who changes firms will not be required to satisfy the Requirements again, provided the track previously completed satisfies the track required by the individual's new position, and since the individual satisfied the Swaps Proficiency Requirements there has been no two-year period during which the individual was not employed by a swap dealer or its affiliate, or approved as a swap AP at an intermediary swap firm.

Now I'll talk about how individuals will take these Requirements. The Swaps Proficiency Requirements are being administered online. Individuals will not be required to travel to a separate testing location, and may complete the Requirements using a business or personal computer. Firms should ensure that their employees are able to access the Swaps Proficiency Requirements website listed on your screen. The Requirements are accessible via most modern web browsers, including Firefox, Edge, and Chrome. I will note that Internet Explorer is not supported, so please plan to use a different browser. We also recommend that individuals use a wired connection while taking the requirements. You can find a link to the technical requirements in the FAQs.

And now I'll turn it over to Jennifer to discuss logistics of the Requirements in greater detail.

Jennifer Sunu: Thanks, Sudhir. Each NFA Member with APs required to take the Swaps Proficiency Requirements must designate at least one Swaps Proficiency Requirements administrator, or SPR admin, who will coordinate enrollment into the appropriate track and track each individual's progress. A number of firms have already designated their SPR admins to date. If your firm has not, please be sure to do so as soon as possible. And more information regarding SPR admins can be found on the Swaps Proficiency Requirements website.

NFA Members' SPR admins will enroll individuals from their firms into the Swaps Proficiency Requirements directly using a bulk upload mechanism, or will provide an enrollment code for individuals to enroll themselves without paying the $100 fee. SPR admins may enroll not just APs as required by NFA rules, but also individuals employed by an NFA Member in a non-AP capacity, such as principals, compliance, and legal staff. Please note that NFA will not issue refunds for any individual affiliated with a Member firm who self-enrolls and pays the $100 non-Member fee. Individuals not affiliated with a Member firm may enroll themselves in either track of the Swaps Proficiency Requirements for $100.

Once an individual's firm's SPR admin enrolls them in a system, they will receive an email from the system with login instructions. If they do not receive this email, they should check their Spam folder. If not found there, they should contact the firm's SPR admin or appropriate firm personnel. Clicking the link in this email will take the individual to the Swaps Proficiency Requirements login page. They will then log in, using the username and temporary password provided in the system-generated email. Copying and pasting a password from this email will often copy an extra space, causing the password to fail. NFA strongly recommends typing in the password.

All individuals will be required to agree to an attestation statement before being permitted to access NFA's Swaps Proficiency Requirements. Individuals must attest, among other things that they are the person that they represent to be and that they will not engage in any testing irregularity or cheating.

I will now discuss some of the specifics relating to the modules. Individuals may complete all of the required modules in one sitting, or they may complete the modules one at a time, as their time and schedules permit. There is no time limit to complete each module. Individuals may exit and reenter the training or testing component of NFA's Swaps Proficiency Requirements at any time, and the system will automatically save the individual's progress. This progress will also be saved if the individual is logged out by the system due to a period of inactivity.

The test questions included in the module are solely based on the content within the training portion of that module. Therefore, there is no need to prepare to take the Swaps Proficiency Requirements through additional training, and NFA does not intend to provide a study guide. Individuals must receive a score of 70% or greater on each module to pass NFA's Swaps Proficiency Requirements. The modules must be completed in the order they are presented. Individuals may not skip around between modules.

Upon entering a module, individuals will first complete the training, and will then take the test. Prior to entering the testing portion of a module, they may return to previous sections of the training portion of the module, but may not skip over any part of the training portion. Once an individual has begun the testing portion of a module, they may not return to the training portion. Upon completion of each test, individuals will receive their score for that module. However, because this is a proficiency requirement and not just a training, they will not be able to see the questions the individuals answered incorrectly.

If an individual fails one or more tests within the required track by receiving a score of less than 70%, they must continue to the next module and complete the remaining modules in their track before being allowed to retake any failed modules. Individuals needing to retake modules will do so in the order in which they appeared in their track. There is no waiting period to retake a module, and there is no limit to the number of times an individual may retake a module.

The tests are generated by an extensive question bank, and all questions and answers are randomized, so individuals will not receive the same test in subsequent attempts of the same module. Member firms will have the ability to track and employee's progress, including test scores and number of attempts using the Individual by Status Firm report, which is accessible through NFA's Online Registration System, which we will briefly discuss later on this presentation.

Now that I've walked through some logistics, I will show you what a module looks like, and highlight some of the system's navigation tools. Once in the system, to access the training portion of this module as indicated by the book icon next to the module name, click on the module name. Here, a brief description of the module will be displayed. After reviewing, click "Enter." I want to again emphasize that individuals may exit and reenter the module at the place that they left off, and they also return to other sections of the module until they are ready to begin the test.

The training will appear as shown on this slide. Click "Start" to begin. Each module begins with instructions that indicate the estimated completion time for the module, state whether there is recommended or optional audio, describe how to use the functionality within the module, and outline information on the test. I want to point out a few things on this slide that individuals may find useful as they progress through the training.

First, each screen within the training includes a progress bar, so individuals can see what percentage of the training they've completed. Here, I've completed 1%. Use the "Next" button in the right-hand corner to navigate to the next screen. As a reminder, individuals may not skip ahead in the training portion, but may go back to look at a screen previously viewed. Throughout the training, there are several underlying terms. Clicking on these terms bring up their definitions. Individuals may also quickly access a glossary of all terms that are defined in the Swaps Proficiency Requirements by clicking on "Glossary" in the upper right corner.

The last piece of functionality I want to point out is the "Audio Transcript" button on the upper-most part of the screen on the right side. Every module has audio, either optional or recommended. But there is not audio on every screen. If an individual prefers to read the audio transcript rather than listen to the narration, they can click on "Audio Transcript."

Once an individual reaches the end of the training, they will see a screen indicating that they can review any portion of the module, which they can do by using the "Back" button, or menu to navigate to any section within the module. If they are ready to take the test, they click "Complete Module." Once an individual indicates that they are ready to begin the test, they may not access the content portion of the module again. Therefore, an individual should not indicate that they are ready to take the test until they are completely done with the training portion of the module.

After an individual indicates that they are ready to take the test, they will see one final screen. They should click the "Exit" button in the top right of the page to proceed to the test. Once an individual has completed the training portion of the module, they will have a blue checkmark next to that training, indicating that it was successfully completed. They will also be granted access to the test for that module. Tests are denoted by a pencil icon. Click on the test name to begin the test. There are instructions at the beginning of each test and individuals should read them carefully. As a reminder, a score of at least 70% is required to pass each module.

I want to point out of few features on the test. As you can see, the test questions and answers have been redacted for purposes of this presentation. Once inside the testing portion of a module, click the icon with three horizontal lines at the top left of the screen to reveal the test navigation menu. Use this menu to see the number of questions within the test, and quickly jump to another question. Additionally, clicking "Flag a Question" will mark a question to review later.

After reaching the last question in the test, there is a "Review Answers" button. Answers can also be reviewed at any time by using the link in the test navigation. After clicking "Review Answers," a summary with the answers will be displayed. You can see I answered question one, flagged but did not answer question two, and did not answer the remaining questions. For this demo, I'm going to intentionally fail this module and will click "Submit" to submit for scoring.

A confirmation screen will appear, indicating that once "Submit" is clicked, the answers cannot be changed. Click "Cancel" to return to the test or "Submit" to submit the test for scoring. After submitting, by scrolling past the instructions, the score will be displayed. I received a zero. So I will need to retake this module, both the training and the test, after I complete the other modules in my assigned track. The system will automatically facilitate this for me. By clicking "Back to Track," an individual will be able to proceed to the next module.

Here the training portion of the regulation of swaps market module can be accessed.

You'll see a red "x" next to the Swaps Products and Applications test, indicating the individual needs to retake that test. The system will prevent individuals from retaking it from this screen until they finish the other modules in their track.

Once an individual has passed all modules in their track, they will receive a Swaps Proficiency Requirements certificate of completion. Individuals should save or print their certificate, and retain it for their records. If an individual is affiliated with an NFA Member, regardless of whether or not they are individually registered, their firm's authorized ORS users may verify the individual's proficiency status using an ORS report a few hours after they've passed the Requirements. Sudhir will talk more about ORS reports shortly.

As with NFA's other proficiency requirements and as mentioned previously, an individual's proficiency status will remain current, unless they have a break in their designation as a swap AP or affiliation with a swap dealer for more than two consecutive years. Individuals not currently affiliated with an NFA Member firm will have two years from the date they pass the Requirements to become designated as a swap AP or to become employed as a swap dealer or its affiliate.

I will now turn it back to Sudhir to discuss the reports available in ORS, as well as the resources related to the Swaps Proficiency Requirements available on NFA's website.

Sudhir Jain: Thank you, Jennifer. NFA has made two reports related to the Swaps Proficiency Requirements available to all authorized ORS users, including SPR Admins. You can access these reports using the links on the Swaps Proficiency Requirements web page. The first is the Individual Status by Firm report. This report lists by firm the track and progress of individuals who are enrolled in NFA's Swaps Proficiency Requirements. Authorized ORS users can only access firms with which they are affiliated in ORS.

As shown here on the screen, this report contains a number of fields, each of which are sortable. The firm NFA ID, first name, last name, birth year and email address fields will help you identify the person you are looking for. It also shows the track in which each individual is enrolled, and the date the individuals earned the Swaps Proficiency Requirements certificate, where applicable. You can see how many attempts individuals took to complete the Requirements, or if they are not yet completed, where these individuals are within their track.

Now I'll walk through how to read the various records from this report. I would like to note that these are the records that have been created for the purposes of this webinar, and do not reflect real data. Looking at the first row, I can see that the highlighted individual earned their certificate in July, having passed all modules in the Short Track in the first attempt. The next individual on the report, who also earned a certificate, failed one or more modules in attempts one and two, but passed all required modules by the third attempt.

The third individual on this report has been enrolled in the Long Track. But because there is no link under any of the attempts, I know that this individual has not yet started the Requirements. Scrolling down, I see one more individual on my report. This person's record indicates that they have started, but not finished, attempt one; which means they have not completed with a passing or failing score each module in their assigned track. If I want more information on where any individual stands or what score they received on a particular test, I can click the link under the applicable attempt.

Here I clicked "In Progress," and the track history window pops up. I can see that this individual completed the training portion of the first module, Swap Products and Applications on July 9, and also completed the Swap Products and Applications test, failing with a score of zero. This person will continue on to the second module in his or her assigned track. But after completing all modules, will need to retake the training and test portion for Swap Products and Applications until this module is passed. Authorized ORS users can also export all the information in this report, including attempt progress, into Excel.

The second report NFA developed related to Swaps Proficiency Requirements is the completion date by individuals report. This report, also available to authorized ORS users, allows the search of individuals who have successfully completed NFA's Swaps Proficiency Requirements. The report includes first name, last name, birth year, the track completed, and the date the certificate was earned. Unlike the Individual Status by Firm report which shows everyone enrolled in the Swaps Proficiency Requirements who are affiliated with your firm, this report allows authorized ORS users to search for any individual who successfully completed the Requirements, regardless of firm affiliation.

If they are currently taking the Requirements, they will not appear on this report. This report is helpful for firms to verify whether potential hires have earned their certificates and to keep a current list of those individuals from their firm who have earned their certificate over time. To use this report, simply enter the individual's first name and last name in the search boxes, and click "Search." You can see here a list of all individuals who match the search terms and have completed the Swaps Proficiency Requirements. In this case, you see that Tom Sexton, NFA's President and CEO, earned his Swaps Proficiency Requirements certificate as a part of a pilot program in July.

We have covered quite a bit of information in this webinar, and we don't expect you to remember everything we have discussed today. I want to point out that all of the information we have covered is also available on NFA's website. By accessing the page on NFA's Swaps Proficiency Requirements shown here on the screen, you will find instructions for navigating the Swaps Proficiency Requirements system, as well as links to related FAQs, Notices to Members, and more.

Additionally, should you have questions not answered by the resources on NFA's website, you are welcome to email or call NFA's Information Center using the contact information on your screen. Information Center representatives are available from 8:00 a.m. to 5:00 p.m., Central Time, Monday through Friday.

To close, I wanted to remind you that the Swaps Proficiency Requirements are available online now. In order to start or continue acting as a swap AP at an FCM, IB, CPO, or CTA, or as an AP of a swap dealer; you must pass the Swaps Proficiency Requirements by the Compliance Date of January 31, 2021. A current swap AP at an FCM, IB, CPO, or CTA that does not satisfy the requirement by the compliance date will have their swaps approval status set to pending.

And now I'll turn it back over to Christie.

Christie Hillsman: Thanks, Jennifer and Sudhir, for all of that helpful information. This concludes the prepared portion of today's webinar. But throughout this discussion we've received a number of great questions. At this point, I'd like to invite a few additional NFA staff to join me to help answer your questions: Lauren Brinati, Managing Director of Market Regulation; Lisa Guess, Associate Director of Information Systems; Kristen Scaletta, Associate Director of Communications; and Julia Wood, Senior Attorney. If, for whatever reason, we don't get to your question or if you've submitted a firm-specific question, an NFA staff member will respond to you via email within about a week.

The first question that we received, I'm going to pass to you, Jennifer. And that question is, "Is there a continuing education component?"

Jennifer Sunu: Thanks, Christie. No. Similar to the Series 3 and Series 34, proficiency requirements for Futures and Forex APs, there is no continuing education component to NFA's Swaps Proficiency Requirements.

Christie Hillsman: Great. Thanks, Jennifer. And I'm actually hoping you can answer our next questions as well. That question is: "What languages is the Swaps Proficiency Requirements offered in?"

Jennifer Sunu: The test is only offered in English. Currently, NFA's other proficiency requirements that are offered at testing centers, the Series 3 and 30, are not provided in other languages. But people are allowed additional time to take the Requirements if English is not their first language. Given that this is not timed and that current APs have a year to complete the requirements, APs will need to complete the Requirements on their own, without receiving assistance from another person.

Christie Hillsman: Great. Thanks, Jennifer. And Sudhir, I'm going to turn to you with our next question. That is, "I'm a registered swap AP affiliated with more than one NFA Member. Do I need to take the Swaps Proficiency Requirements once for each affiliation?"

Sudhir Jain: Thanks, Christie. The answer is "no." You only need to take NFA's Swaps Proficiency Requirements once. As long as you ensure that one of our Member firms for which you are a swap AP has enrolled you in the system, NFA will then match your information once you pass the Swaps Proficiency Requirements to ensure your ORS status is updated for all Member firms for which you are registered.

Christie Hillsman; Great. Thank you, Sudhir. Jennifer, I'm going to turn back to you with our next question. "Can I take the Swaps Proficiency Requirements on my phone?"

Jennifer Sunu: The Swaps Proficiency Requirements consist of streaming content and cannot be downloaded, and therefore, we recommend using a hard-wired internet connection, and taking the requirements on a work or a personal computer.

Christie Hillsman: Great. Thank you. Sudhir, I'm going to turn back to you with our next question. That is, "What types of questions are included in the testing portion of the Swaps Proficiency Requirements?"

Sudhir Jain: The test will include both true-false as well as multiple choice questions. I will note, all test questions are randomized, including the true-false questions. So it is very important to pay close attention before submitting your answers.

Christie Hillsman: Great. Thanks, Sudhir. And I'm going to hand our next question to you as well. That is, "Is there a limit to how many times I can take the Requirements? And then if I fail the Requirements, is there a waiting period before I can take them again?"

Sudhir Jain: There is no waiting period to retake the Requirements, but you must take all tests in your appropriate track prior to retaking any failed tests. Additionally, there is no limit as to how many times you may retake the Requirements. But note that your Member firm does have access to the results, and will be able to see if you had to retake a test several times over.

Christie Hillsman: Thanks, Sudhir. Jennifer, I'm going to turn back to you with our next question: "How much does it cost to take the Swaps Proficiency Requirements?"

Jennifer Sunu: Well, if you're affiliated with an NFA Member firm in any way, so as an AP, a principal, legal staff, compliance staff, anything like that; there's no cost to take the Swaps

Proficiency Requirements. The only individuals who would be required to pay the $100 fee are those people who are not affiliated with an NFA Member firm, but who may still be interested in satisfying the Swaps Proficiency Requirements, for example, an outside CPA or an outside regulatory consultant.

Christie Hillsman: Great. Thanks, Jennifer. And next, I'm hoping you can talk a little bit about more of a broad-based topic that we're getting a handful of questions on. It sounds like some people would like to hear a little bit more about which track APs at, for example, swap IBs, should be taking when it comes to the Swaps Proficiency Requirements.

Jennifer Sunu: So any swap intermediary, so that's FCM, IB, CPO, or CTA; any APs at those firms or any people who are not APs but want to take the Swaps Proficiency Requirements at those firms, would take the Short Track. The Long Track is designated for those APs at swap dealers.

Christie Hillsman: Thanks, Jennifer. And I'm hoping you can actually answer our next question as well. And that question is, "Does the SPR admin also need to take either the Long or the Short Track?"

Jennifer Sunu: So if the SPR admin is not a swap AP, they are not required to take the Swaps Proficiency Requirements. But just like any other employee at a swap firm, they may take the Requirements if they would like to.

Christie Hillsman: Thanks, Jennifer. Lauren, I'm going to turn to you with our next question. We've got a question about the difference between the Long Track module Anti-Fraud and Ethical Practices, and then the Short Track module called Compliance, Anti-Fraud, and Other Requirements.

Lauren Brinati: Thanks, Christie. Someone has been paying close attention to the modules that have been listed out in the FAQs on our website. So as a reminder, the Long Track has eight modules. The Short Track has four modules, and there is a very similar-sounding module in both. In the Long Track, it is the Anti-Fraud and Ethical Practices module. For the Short Track it is the Compliance, Anti-Fraud, and Other Requirements module. Overall, they cover very similar broad-based concepts regarding fraudulent activity, noncompliance types of issues, and NFA rules that apply to all NFA Members, no matter if they are a swap dealer or a swap intermediary, such as an FCM, IB, CPO, or a CTA.

The module in the Long Track is tailored slightly more to swap dealers and their activities. And the module in the Short Track is tailored more to swap intermediaries. However, as both Jennifer and Sudhir discussed, swap dealers do have the option to allow APs who are not directly involved in the negotiation and sales and trading activity of swaps, but who may be designated as an AP to take the Short Track. So we have ensured that the rules and subjects covered in the Short Track are broad enough so that they are applicable to all types of APs, no matter what type of NFA Member firm they are associated with.

Christie Hillsman: Great. Thanks, Lauren. And Jennifer, I'm going to turn back to you with our next question. We've got another one about who's required to take the Swaps Proficiency Requirements. We've gotten actually a couple questions about whether principals are required to take this training.

Jennifer Sunu: So again, if a principal is not a swap AP and they're only a principal, they are not required to take the training, but they may choose to take the training if they wish.

Christie Hillsman: Great. Thanks, Jennifer. I think this is going to conclude the question-and-answer portion of our webinar today. So to close, I'd just like to point out that as you may know, NFA holds annual in-person Member regulatory workshops. We discussed the Swaps Proficiency Requirements at last year's workshops. And again, this year, this will be an important topic in Chicago, New York, and London coming up in late February and early March. You can look forward to an email from NFA this week with workshop registration information if you're interested.

And then finally, I would just like to remind everybody that you'll be able to access a recording and a transcript of today's webinar on NFA's website in the coming weeks. And finally, if we did not get to your question today, an NFA staff member will respond to you with an answer via email. And then as Sudhir mentioned, you may also reach out to NFA's Information Center at any time, using the contact information on your screen.

Thanks for participating in today's webinar.