

The following instructions outline how to file a disclosure document using NFA's Electronic Disclosure Document Filing System. If you have questions, please contact NFA's Information Center (312-781-1410 or 800-621-3570 or information@nfa.futures.org).

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# About NFA's Electronic Disclosure Document Filing System (DDOC System)

CPOs and CTAs filing a disclosure document with NFA for review are required to submit their filings through NFA's DDOC System. NFA will not accept any disclosure document filings through any other mode (i.e., email, fax, or regular mail).

Filers are able to track the status of their submissions online, in real-time, and have instantaneous access to NFA's comment and acceptance letters. Additionally, all correspondence, including filed disclosure documents and NFA's comment or acceptance letters, are archived in the DDOC System, creating an electronic file cabinet that can be easily accessed by firm at any time.



## Accessing NFA's DDOC System

- 1. Click "Electronic Filing Systems" at the top of any page of <u>NFA's website</u>.
- Click the plus sign (<sup>v</sup>) by either the CPO or CTA section to see a list of systems for CPOs and CTAs. From this list, click "Electronic Disclosure Document Filing System."



Note: Only NFA Member firms can file a disclosure document.

Due to the confidential nature of a firm's disclosure document, anyone intending to file a disclosure document on behalf of a firm will need to have the appropriate login credentials. This can be done through NFA's Online Registration System, called ORS, which can be accessed through NFA's website. The firm's ORS Security Manager can accomplish this quickly and easily by designating a username and password with disclosure document permissions in ORS. Login credentials need only be created the first time a user intends to use the DDOC System and will remain valid until revoked by the firm's ORS Security Manager. The ORS Security Manager may also give DDOC System access to attorneys or other designees. However, it is important to note that any person who has valid disclosure document login credentials will be able to access NFA's comment or acceptance letters, as well as the document filing itself.

4. Once logged in, you will see the Disclosure Document Filing System Welcome page.

# NFA

# Electronic Disclosure Document Filing System User Guide



This Welcome page contains general information and instructions for accessing help or proceeding with your filing.

From time to time, NFA may use this page to communicate important announcements to Member firms; for example, rule changes or Notices to Members pertaining to Disclosure Documents may be highlighted here (in addition to NFA's current methods of communicating such information).

**"Help"** will always appear as a link in the left-hand navigation; you can access detailed instructions at any time while you are logged into the DDOC System simply by clicking this link. You can also access help by clicking on

the <sup>1</sup> button located next to specific lines or questions throughout the screens.



#### Filing a New Disclosure Document

To file a disclosure document, click **NEXT** on the Welcome page, or click "Filing Index" in the left-hand navigation.

The Filing Index is your default starting point and will serve as your electronic filing cabinet for documents and correspondence with NFA. It is important to note that only disclosure documents filed through this electronic DDOC System will appear in this index. First time filers through the DDOC System may not see any prior filings in the Filing Index even though they may have filed previously filed documents with NFA. Going forward, all of your submissions and correspondence from NFA will be preserved here and you will have access to it at any time.

NFA	National Futures Association - D	bisclosure Document System
NATIONAL FUTURES ASSOCIATION		
	Filing I	ndex
Filing Index		
Help Logout	DEMO COMPANY LLC	NFA ID: 0123456
	If you wish to contact the reviewer directly regard submitted, you may use the "Send Message" link. disclosure documents within 14 days of receipt.	ing a disclosure document filing you recently Please note that in general, NFA reviews most
		File CTA Disclosure Document
	CTA Filings CPO Filings	
	Click on File a Disclosure Document to send	us your Disclosure Document
		File CTA Disclosure Document
	© 2003-2021 National Fu	tures Association

If your firm has both CPO and CTA registrations, you will notice two tabs at the top of the Filing Index which will distinguish your CTA disclosure document filings from your CPO disclosure document filings. If your firm is registered solely as a CPO or a CTA, you will only see the tab that applies.

**Note**: This screen will always reflect the current status of your disclosure documents. In this example there have been no disclosure documents submitted.

1. To begin a new filing, click File Pool Disclosure Document or

File CTA Disclosure Document at the top or bottom of the appropriate tab. Although the screens displayed in this Guide mostly illustrate the process of filing a CTA disclosure document, the process is virtually identical for filing a CPO disclosure document.



2. Filing through the DDOC System will require that you enter certain key information from the disclosure document you are filing. It is recommended that you have a copy of the document handy before you begin the filing process. On the Cover Page, indicate the date of the document and identify the program or programs offered in it.



#### Cover Page

The Cover Page section requires the below information to be provided regarding the disclosure document.

	National Futures Association - Disclosure Document System
	Document has not been submitted
NATIONAL FUTURES ASSOCIATION	
	Cover Page
Filing Index Help Logout	DEMO COMPANY LLC NFA ID: 0123456
	New Filing Oisclosure Document Date:
	Select the Program(s) offered by this disclosure document.
	(To add or change program click here)
	ABC TRADING PROGRAM
	SYZ TRADING PROGRAM
	Does the document qualify for instant filing treatment pursuant to CFTC Advisory     95-447     No     Yes, I attest the document qualifies for instant filing treatment pursuant to CFTC Advisory 95-     44 because the document contains no material changes from the document previously accepted     by NFA and all changes to the document have been highlighted.
	Save 🖬 Next 🕨
	Site Index   Links   Contact NFA   Privacy   What's New   Home
	© 2003-2021 National Futures Association

For CTAs, the DDOC System will require that you give each offered CTA trading program a discrete name (e.g., "S&P Program," "Beta Program") so NFA may track performance information and other data. See <u>How to Add a New CTA Program to the DDOC System</u> for details.

If you have a previously accepted disclosure document on file for the offered program(s) and meet the other requirements set forth in <u>CFTC Advisory 95-44</u>, you can request instant filing treatment for the disclosure document. A document that qualifies for instant filing treatment will receive an expedited review. However, the firm will need to attest that the disclosure document qualifies.

Once you have entered the requested information, save the data by clicking on the Save Grow or the Next > buttons at the bottom of the screen. This will bring you to the Contact Information page.



#### How to Add a New CTA Program

 Enter the trading program by clicking on the link under "Select the Program(s) offered by this disclosure document" (see the green box below). Ensure the name entered is consistent with the name(s) of the offered programs in the disclosure document.

NFA	National Futures Association - Disclosure Document System Document has not been submitted				
NATIONAL FUTURES ASSOCIATION					
	Cover Page				
Filing Index Help Logout	DEMO COMPANY LLC	NFA ID: 0123456			
	New Filing           Ø Disclosure Document Date:           Ø Select the Program(s) offered by this disclosure document.           (To add or change program click	0			
	Save 🖬	Next >			
	Site Index   Links   Contact NFA   Privacy   What's New   Home				
	© 2003-2021 National Futures Association				

 The Program Maintenance Page requires you to indicate the general types of products traded by the program by clicking the appropriate investment sectors/products (futures, off-exchange forex, underlying or spot virtual currencies, etc.). You will always have the ability to update this information if the program changes. See <u>How to Update an Existing CTA Program</u> for details.

NEA	National Futures Association - Disclosure Document System				
NATIONAL FUTURES ASSOCIATION					
	Program Maintenance				
Filing Index Help Logout	DEMO COMPANY LLC NFA ID: 0123456				
	Add Program       Image: Constraint of the second sec				
	Site Index   Links   Contact NFA   Privacy   What's New   Home © 2003-2023 National Futures Association				



#### How to Update an Existing CTA Program

 To edit a program name, enter a program cease date, edit products traded by the program, or delete a program, click on the link under "Select the Program(s) offered by this disclosure document" (see the green box below).

NEA	National Futures Association - Disclosure Document System						
	Document has not been submitted						
NATIONAL							
ASSOCIATION							
	Cover Page						
Filing Index							
Help	DEMO COMPANY LLC NEA TD: 0123456						
Logout							
	New Ciles						
	Disclosure Document Date:	1					
	Select the Program(s) offered by this disclosure document.						
	(To add or change program click here)						
	ABC TRADING PROGRAM						
	LIMN TRADING PROGRAM						
	XYZ TRADING PROGRAM						
	Save 📕 Next 🕨						
	Site Index I Links   Contact NFA   Privacy   What's New   Home						
	© 2003-2021 National Futures Association						

2. The Program Maintenance Page enables you to edit information about your listed programs and to add new programs.

NFA	National Futures Association - Disclosure Document System Document has not been submitted					
N ATIONAL FUTURES ASSOCIATION						
	Pr	ogram Mai	ntenance			
Filing Index Help Logout	DEMO COMPANY LLC		NFA ]	ID: 0123456		
	Add Program			8		
	Program	Ceased Trading	Trading Type	Action		
	ABC TRADING PROGRAM		Futures,Swaps	Edit Delete		
	LMN TRADING PROGRAM		Virtual Currency Derivatives	Edit Delete		
	XYZ TRADING PROGRAM		Off-Exchange Forex	Edit Delete		
	Filing Index					
	Site Inc	dex   Links   Contact NFA   Pr	ivacy   What's New   Home			
	0	2003-2021 National Futu	res Association			



#### How to Add a New Pool

 Enter a new pool by clicking on the link under "Select the Pool(s) that are offered in this document" (see the green box below). Clicking this link will take you to the Annual Questionnaire System where a pool can be added. See the CPO – Pool List section of the Appendix in the <u>Annual</u> <u>Questionnaire User Guide</u> to learn how to add a pool in the system.

NFA	National Futures Association	- Disclosure Document System	
N ATIONAL FUTURES ASSOCIATION			-
	Cove	er Page	
Filing Index Help Logout	DEMO COMPANY LLC	NFA ID: 0123456	5
	New Filme		
	Disclosure Document Date:		
	Select the Pool(s) that are offered in Identify each pool offered in this docume Commodity Pool Operator. To add a Pool click here. You will be taken to	n this document: ent. A pool cannot have the same name as th o the questionnaire system)	ie
	Available Pools:	Selected Pools:	
	TEST POOL 1 TEST POOL 2 TEST POOL 3 TEST POOL 4 TEST POOL 6 TEST POOL 6 TEST POOL 6 TEST POOL 8	>>> <<	< >
	< >>	<	>
	Se	ave 🖬 Next	>
	Site Index   Links   C	iontact NFA   Privacy   What's New   Home	
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After the pool has been added through the Annual Questionnaire System, it will appear in the Available Pools box. Select the applicable pool(s) and click is to transfer the pool to the Selected Pools box.

**Note**: If the disclosure document is offering investments in pools that are Series, ensure the Umbrella is also added as a Selected Pool. Series pools are set up under an Umbrella pool and are structured with a limitation on liability among the different series; series pools are <u>not</u> separate legal entities.



#### Contact Information Page

On the Contact Information page you will provide contact information for the person who will receive all correspondence from NFA pertaining to the filing. You will be asked to complete this screen for every new filing so NFA has accurate contact information.

NEA	National Futures Association - Disclosure Document System					
	Document has not been submitted					
FUTURES						
ASSOCIATION						
	Contact Information					
Filing Index	All correspondence regarding this document (comment letters, acceptance letters) will be					
3 Cover Page	directed to the contact person listed on this page.					
» Relationships	DEMO COMPANY LLC NEA LD: 01	2456				
» FCMs and RFEDs	ABC TRADING PROGRAM	10400				
» Swap Dealer » IB						
>> Performance	Cover Page					
>> Attachments	Who should be contacted regarding this disclosure document?					
# Summary Help	* First Name:					
Logout	* Last Name:					
	Firm Name:					
	* Address:					
	Address 2:					
	Address 3:					
	* City:					
	* State:					
	Province:					
	* Country:					
	* Zip:					
	Secondary Phone:					
	* consile					
	* Varify Emails					
	Will this document be used to solicit only QEPs?:					
	Oyes					
	No					
	Required Fields					
	Previous Save Next	>				
	Site Index   Links   Contact NFA   Privacy   What's New   Home					
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#### QEP Only Disclosure Documents

If the firm is filing a CTA disclosure document and the firm is a 4.7 exempt CTA, then at the bottom of the Contact Information page you will be asked whether this disclosure document will <u>only</u> be used to solicit Qualified Eligible Persons (QEPs). **Note**: 4.7 exempt CTAs are required to submit disclosure documents if they intend to solicit non-QEPs.



#### Relationships Pages

The next series of screens require that you indicate any business relationships you have with other NFA Member firms, as it pertains to the program(s) offered in the disclosure document you are filing.

The most frequent example of such a relationship is an FCM or IB that you require your customers to clear through. But this is just one example. You should indicate all relationships you have with an FCM or IB for the offered program.





#### CTAs, Investee Pools, and Trading Managers for Pool Disclosure Documents

Pool disclosure document filings will also be required to disclose the pool's relationships with CTAs, investee pools, and trading managers. You must indicate if a relationship exists for each of these relationship categories.

If the pool(s) have any relationships in these categories, you must indicate the name of each entity and the approximate percentage of funds that are allocated to each entity.

If a relationship does <u>**not**</u> exist for a particular category, you must check the box indicating there are no relationships for that category before you can proceed with the filing.



To edit the percentage allocation of an existing relationship, you must "Delete" the entity and re-add it.



#### Performance Information Page

Next, you must provide information about the performance of the offered trading program(s).

Note: Do not add proprietary or hypothetical performance.



If there is performance information for the offered program(s), click on <sup>(Edit)</sup> in order to enter the performance capsule information.



#### Capsule Tab

1. First, you must provide information about the trading program under the **Capsule** tab, just as it appears in your disclosure document. If you are unclear what information is being requested in any of the fields, you can access explanatory help text by clicking **1** to the left of any line.



Once you have entered the requested information, save the data by clicking on the Save or Next buttons at the bottom of the screen. Click
 Next to proceed to the **Performance** tab.



#### Performance Tab

1. On the **Performance** tab you must enter performance data information for the offered program.

Performar	ice						
MONT		ANNUAL R	ATES OF RE	TURN			
Enter in	your annu	al rate of ret	urn, enter 'N	IT' to indicate	Not Trading	2016	2015
Jan	2021	2020	2019	2018	2017	2016	2015
Feb							
March		<u> </u>			<u> </u>	<u> </u>	
April						{	
May							
June		j <u> </u>			j	j <u> </u>	j
July							
August		<u> </u>			<u> </u>	<u> </u>	
Sept		┤┝────			┤┝───		
Oct	L	{					
Nov		1	1	1	1	1	1
Dec					1		
Year							

 Monthly and annual rates of return should be entered here for the offered program <u>only</u> and should be entered just as they appear in your disclosure document. Required performance data only needs to be entered for the last five calendar years and the current year-to-date, even if the disclosure document includes supplemental performance which is more than five years old.

If the offered program has been trading for less than five years, just enter performance for the months that apply. However, if there was no trading in any month *after* the program started, you will need to indicate those months by entering "NT" for "no trading" into the applicable boxes.



#### Attachments Page

This is where you will upload your disclosure document and any other files you want NFA to review. Just browse your computer to attach Word or pdf files, one at a time.

If you're filing a subsequent disclosure document or a revision, remember that pursuant to <u>NFA Notice I-08-17</u>, you're required to include both a "marked" version of the disclosure document which clearly indicates all additions and deletions, and a "clean" copy of the disclosure document in which all your changes are incorporated.

	National Futures Asso	ciation - Disclosure Document System
	Docum	nent has not been submitted
NATIONAL		
F U T U R E S ASSOCIATION		
		Attachments
Filing Index	This same allows you to upland the	
» Cover Page	and any other relevant corresponde	nce or supporting information. Attachments should be
Contact Information	uploaded and saved separately.	
» Relationships » ECMs and REEDs	If you have providually filed disc	locure documents for this program(s) NEA requires
» Swap Dealer	you to submit both a clean and	marked copy of the documents. Please see NFA's Notice
» IB	to Members I-08-17.	
» Performance » Attachments	DEMO COMPANY LLC	
» Summary	ABC TRADING PROGRAM	NFA ID: 0123456
Help		
Logour	Attachments	
	Select Document to send:	Browse
	Select Document Type:	DISCLOSURE DOCUMENT - CLEAN V
		Save Attachment
	Do	cuments Attached
	No Attachments include	ed this session
	Previous	Next >
		i i oni i i
	Site Index	Links   Contact NFA   Privacy   What's New   Home
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Use the dropdown menu to identify each file that you attach – for example, "DISCLOSURE DOCUMENT – CLEAN" or "COVER PAGE," then click <sup>Save Attachment</sup>, you'll see a list of documents you've successfully attached. If you accidentally attach the wrong file, you can simply click "Delete" to remove it, and then you can upload another file.



#### Summary Page

The final screen is the Summary page. All sections that you've completed will be identified with a  $\checkmark$ on the right; any section which has not yet been completed is denoted by a X. You will not have the option to submit the disclosure document to NFA until all the sections have been completed. Take this opportunity to briefly review the summary information for accuracy.

NATIONAL FUTURES National Futures Association - Disclosure Document Syst	em
NATIONAL FUTURES	
NATIONAL	
FUTURES	
ASSOCIATION	
Disclosure Document Submission - Summa	ry
Filing Index Review the summary below to ensure that the information is correct before submitting t	he filing.
» Cover Page You will not be allowed to submit your filing unless all sections are checked (√).	
» Contact Information	
» Relationships DEMO COMPANY LLC NFA ID: 0	0123456
ABC TRADING PROGRAM	
» IB	
» Performance	
» Attachments Summary	
» Summary Document Date: 5/1/2021	(Edit) √
Help Programs:	(Edit) √
Logout ABC TRADING PROGRAM	
Performance:	(Edit) √
ABC TRADING PROGRAM-No Performance Entered	
Will this document be used to solicit only QEPs?: No	(Edit) √
FCM Relationships: No FCM relationships	(Edit) √
Swap Dealer Relationships: No Swap Dealer relationships	(Edit) √
IB Relationships: No IB relationships	(Edit) √
Contact Information: Individual A	(Edit) √
123 Main Street	
SUITE A	
Somewhere	
US	
555-555-5555	
MAIL@DemoCompany.com	
Attachments:	(Edit) 🗙
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If anything needs to be changed, you can simply click (Edit) to navigate directly to that section, or you can use the menu on the left-hand side.



Once all sections are

complete (designated by  $\checkmark$ ), a Submit To NFA button will appear at the bottom of the screen. Click on this button to complete your filing.

National Futures Association - Disclosure Document System Document has not been submitted IONAL FUTURES ASSOCIATION Disclosure Document Submission - Summary Filing Index Review the summary below to ensure that the information is correct before submitting the filing. » Cover Page You will not be allowed to submit your filing unless all sections are checked (√). » Contact Information » Relationships DEMO COMPANY LLC NFA ID: 0123456 » FCMs and RFEDs ABC TRADING PROGRAM » Swap Dealer » IB Summary » Performance Document Date: 5/1/2021 (Edit) 🗸 » Attachments » Summary Programs: (Edit) 🗸 Help ABC TRADING PROGRAM Logout Performance: (Edit) √ ABC TRADING PROGRAM-No Performance Entered Will this document be used to solicit only QEPs?: No (Edit) √ FCM Relationships: No FCM relationships (Edit) 🗸 Swap Dealer No Swap Dealer relationships (Edit) 🗸 Relationships: IB Relationships: No IB relationships (Edit) 🗸 Contact Information: Individual A (Edit) 🗸 123 Main Street SUITE A Somewhere AK 99999 US 555-555-5555 MAIL@DemoCompany.com Attachments: (Edit) 🗸 ABC Trading - Marked.pdf(DISCLOSURE DOCUMENT -MARKED) ABC Trading - Clean.pdf(DISCLOSURE DOCUMENT - CLEAN) Submit To NFA Site Index | Links | Contact NFA | Privacy | What's New | Home © 2003-2021 National Futures Association



Upon completing the filing process, you will see a confirmation on your screen that the filing has been successfully submitted. Also, the next time you view the Filing Index, you will see the disclosure document you just filed.



NFA will contact the person you designated when our review is completed or if there are any questions during the review process. Although review times may vary depending on the type of the filing, the size of the disclosure document, and the volume of disclosure documents being reviewed at any given time, NFA generally will review your disclosure document within 14 days from the time you submit it. When a comment or acceptance letter is ready, it will automatically be posted in the Filing Index and an email will be sent to the contact person for the filing informing them the letter is now available in the DDOC System.



# Filing a Revision and Responding to Comments

After you have filed a disclosure document through the DDOC System, it will appear in the Filing Index. Here is an example of a Filing Index with several disclosure documents in different review stages. All disclosure documents will have a current filing status.



The system will display the disclosure documents with the most recent document date first.

 The first disclosure document is dated May 15, 2021, which has been submitted and is currently under review. Here the filer can click "Send Message" to the reviewer or click "Attach Support" to attach additional support for the filing.



- The second disclosure document is dated May 1, 2021, but the filing process has not been completed as indicated by the "<u>Continue Filing</u>" message. You may resume the submission process by clicking on "<u>Continue Filing</u>." The DDOC System will then take you to the Summary page where you can see what's left to be completed.
- A comment letter was issued for the fourth disclosure document in this list. Now, the filer will have the option to submit a revision for that Document by clicking "File Revision." Again, the DDOC System will take you to the Summary page. From this page, you can enter new information about the disclosure document, revise information previously provided to NFA, and upload the revised filing.
- The final submission, dated April 1, 2021, is a disclosure document that was accepted. Once a CTA disclosure document has been accepted, the filer can't make any changes to this disclosure document.

#### How to File a Supplement for a Pool Disclosure Document

Once a pool disclosure document has been accepted, you may click "File Supplement", which serves as an addendum/add-on to the accepted pool disclosure document. Supplements must be provided with the accepted disclosure document and are **not** stand-alone disclosure documents.

