

## **CFTC Customer Protection Rule Training Course 2026 (Standard Version)**

### **Course Outline**

The Exchange Analytics CFTC Customer Protection Rule training course was designed to comply with the CFTC's enhanced customer protection requirements for the handling of customers' funds, risk management programs, internal monitoring and controls, capital and liquidity standards, required disclosures to customers and annual training requirement for all finance, treasury, operations, regulatory, compliance, settlement and other relevant officers and employees for FCMs and DCOs holding customer funds.

#### **Standard Course Version:**

- I. Customer Funds Protection
  - a. Definition
  - b. Account Types
    - Customer Segregated Funds
    - Customer Secured Funds
    - Cleared Swaps Customer Collateral
  - c. Depositories
    - Requirements / Locations
    - Special Rule Regarding Location of Customer Secured Funds
    - Acknowledgment Letters / FCM Policies & Procedures
  - d. Customer Deposits
  - e. Letters of Credit
  - f. Segregation Calculations & Reporting
  - g. Residual Interest
  - h. Prohibition on Commingling
  - i. Delivery Accounts
  - j. Hedging Accounts
  - k. FCM Bankruptcy
  - l. No Insurance for Customer Funds
  - m. Guarantees Against Loss
  - n. Investment of Customer Funds
  - o. Liquidity and Time to Maturity
  - p. Loss Allocation
  - q. Customer Loans
  - r. Capital and Liquidity
  - s. Failure to Comply with Capital Requirements
  - t. Customer Funds
- II. Reporting
  - a. Financial Reporting
  - b. Notice Filing Requirements
  - c. Risk Assessment of Affiliates
  - d. Chief Compliance Officer

# EXCHANGE | ANALYTICS

- e. Record Keeping
- f. Off-Channel Communications Records

III. Disclosures

- a. Customer Disclosures
- b. NFA Risk Disclosure Requirements
- c. Eligible Contract Participants
- d. Non-Cash Margin Disclosure
- e. Firm-Specific Risk Disclosure
- f. Web Posting Requirements

IV. Risk Management

- a. Risk Management Program
  - General Requirements
  - Risk and Tolerance Limits
- b. Risk Management Unit
  - General Requirements
  - Periodic Risk Exposure Reports
- c. Reviewing the RMP
- d. Consequences of Failing to Comply

V. Relevant Case Updates/Disciplinary Cases

VI. Regulatory Updates

- a. CFTC Updates
- b. CFTC Compliance Reminders
- c. CFTC & NFA Update
- d. Clearing House Updates

VII. Assessment