



CFTC / NFA Remediation

OVERVIEW



CHALLENGE

The NFA delivered a set of findings to a G-SIB's swap dealer entity indicating that the firm was out of compliance with multiple CFTC regulations, particularly around swap reporting and associated processes and controls.



SOLUTION

The firm selected Treliant to support their remediation efforts. Our derivative processing and swap reporting experts drove identification of root cause issues, scoped remediation work, and performed detailed analysis.



APPROACH

Treliant scoped and facilitated workshops with our experts and client teams to confirm the root cause of issues and facilitate scoping, estimation, and planning for remediation. We then performed a full end-to-end review to validate data mappings and event data mappings, identifying multiple additional issues that needed to be addressed. Treliant led analysis on a remediation workstream to address these additional identified issues.

RESULTS

- ✓ Treliant successfully delivered the project, resulting in a positive response from the regulator.
- ✓ Treliant's effectiveness led to our being asked to provide key analysis and leadership on two follow-on swap reporting projects.