

COVID-19 Regulatory Actions and Developments

Alternative Trading System

Securities and Exchange Commission (SEC)

Date: April 24, 2020

SEC Announces Cross-Divisional COVID-19 Market Monitoring Group

The SEC announced the formation of a senior-level internal cross-divisional COVID-19 Market Monitoring Group to assist the Commission with respect to actions and analysis related to the effects of COVID-19 and to respond to requests for information and assistance from regulators and others.

[External Link](#)

Date: April 20, 2020

SEC Issues Conditional Exemption for CAT Reporting Compliance

The SEC issued an exemptive order establishing a phased Consolidated Audit Trail (CAT) reporting timeline that also allows a delayed start – June 20, 2020 for certain industry members – to CAT reporting in light of the COVID-19 crisis. The SEC simultaneously issued a second exemptive order (available [here](#)) permitting introducing brokers that meet certain requirements to follow the small broker-dealer reporting timeline.

[External Link](#)

Date: April 2, 2020

SEC Staff Statement Regarding Certain Paper Submissions

The staff of the Division of Trading and Markets issued a statement indicating that it will not recommend enforcement action with respect to failures to comply with paper format submission requirements or manual signature requirements, subject to certain conditions. The relief covers submissions for the period from March 16 through June 30, 2020.

[External Link](#)

Date: March 24, 2020

Staff Statement Regarding Rule 302(b) of Regulation S-T

SEC staff issued a statement indicating that it would not recommend enforcement action with respect to a failure to comply with the requirement that signatories to certain electronically filed documents must manually sign a signature page at or prior to the submission of the electronic filing.

[External Link](#)

Date: March 23, 2020

OCIE Statement on Examinations of SEC Registrants

The SEC's Office of Compliance Inspections and Examinations announced that it has moved to conducting examinations of registrants off-site through correspondence, unless it is absolutely necessary to be on-site.

[External Link](#)

Date: March 16, 2020

No-Action Relief Granted from Consolidated Audit Trail Deadlines

SEC staff issued no-action relief to the Financial Industry Regulatory Authority and the national securities exchanges from enforcing their Consolidated Audit Trail (CAT) compliance rules with regard to CAT implementation deadlines against members of FINRA and of such exchanges.

The no-action relief applies through May 20, 2020, but could be extended..

[External Link](#)
