

SUPPORTING STATEMENT
For the Paperwork Reduction Act Information Collection Submission for
Rule 30b2-1

A. JUSTIFICATION

1. Necessity for the Information Collection

Section 30(b)(2) of the Investment Company Act of 1940 (“Investment Company Act”) requires that each registered management investment company (“fund”) file with the Commission copies of every periodic or interim report or similar communication containing financial statements and transmitted to any class of such company’s security holders, such copies to be filed not later than 10 days after such transmission.¹ Rule 30b2-1 under the Investment Company Act requires a fund to file with the Commission (1) a report on Form N-CSR² not later than 10 days after the transmission of any report required to be transmitted to shareholders under rule 30e-1 under the Investment Company Act, and (2) a copy of every periodic or interim report or similar communication containing financial statements that is transmitted by or on behalf of such fund to any class of such fund’s security holders and that is not required to be filed with the Commission under (1), not later than 10 days after the transmission to security holders.

2. Purpose and Use of the Information Collection

The purpose of the collection of information required by rule 30b2-1 is to meet the disclosure requirements of the Investment Company Act and certification

¹ 15 U.S.C. 80a-29(b)(2).

² 17 CFR 249.331 and 274.128.

requirements of the Sarbanes-Oxley Act of 2002,³ and to provide investors with information necessary to evaluate an interest in the fund. The information required to be filed with the Commission permits verification of compliance with securities law requirements and assures the public availability and dissemination of information.

3. Consideration given to Information Technology

Reports required to be filed pursuant to rule 30b2-1 are electronically filed with the Commission. The Commission's electronic filing system (Electronic Data Gathering, Analysis and Retrieval, or "EDGAR") automates the filing, processing, and dissemination of full disclosure filings. The system permits public companies to transmit filings to the Commission electronically. This automation has increased the speed, accuracy, and availability of information, generating benefits to investors and financial markets.

4. Duplication

The Commission periodically evaluates rule-based reporting and recordkeeping requirements for duplication and reevaluates them whenever it proposes a rule or a change in a rule. The information required by rule 30b2-1 is not generally duplicated elsewhere.

5. Effect on Small Entities

The Commission reviews all rules periodically, as required by the Regulatory Flexibility Act, to identify methods to minimize recordkeeping or reporting requirements affecting small businesses. The current disclosure requirements under the rule do not distinguish between small entities and other funds. The burden on smaller funds may be

³ Pub. L. 107-204, 116 Stat. 745 (2002).

greater than for larger funds. This burden includes the costs related to the requirement that funds file their certified shareholder reports with the Commission. These costs could include expenses for computer time, legal and accounting fees, information technology staff, and additional computer and telephone equipment. The Commission believes, however, that imposing different requirements on smaller investment companies would not be consistent with investor protection and the purposes of the disclosure requirements.

6. Consequences of Not Conducting Collection

Less frequent collection of certified shareholder reports would impede the Commission's regulatory functions and impede the amount of current information provided to investors about their funds.

7. Inconsistencies With Guidelines in 5 CFR 1320.5(d)(2)

This collection is not inconsistent with 5 CFR 1320.5(d)(2).

8. Consultations Outside the Agency

The Commission and the Division of Investment Management staff participate in an ongoing dialogue with representatives of the fund industry through public conferences, meetings, and informal exchanges. These various forums provide the Commission and the staff with a means of ascertaining and acting upon paperwork burdens that may confront the industry.

The Commission requested public comment on the collection of information required by rule 30b2-1 before it submitted this request for extension and approval to the

Office of Management and Budget. The Commission received no comments in response to its request.

9. Payment or Gift

No payment or gift to respondents was provided.

10. Confidentiality

No assurance of confidentiality was provided.

11. Sensitive Questions

No information of a sensitive nature, including social security numbers, will be required under this collection of information. The information collection collects basic personally identifiable information (PII) that may include a name and job title. However, the agency has determined that the information collection does not constitute a system of record for purposes of the Privacy Act. Information is not retrieved by a personal identifier. In accordance with Section 208 of the E-Government Act of 2002, the agency has conducted a Privacy Impact Assessment (PIA) of the EDGAR system, in connection with this collection of information. The EDGAR PIA, published on 1/29/2016, is provided as a supplemental document and is also available at <https://www.sec.gov/privacy>.

12. Burden of Information Collection

The following estimates of average burden hours and costs are made solely for purposes of the Paperwork Reduction Act of 1995 (“PRA”) and are not derived from a comprehensive or even representative survey or study of the cost of Commission rules and forms. Compliance with rule 30b2-1 is mandatory for every fund. Responses to the disclosure requirements are not kept confidential.

We estimate that there are approximately 2,207 funds, with a total of approximately 11,977 portfolios that are affected by the rule. Each of those 2,207 funds is required by rule 30b2-1 to file with the Commission reports on Form N-CSR and periodic or interim reports or similar communications containing financial information that is transmitted to shareholders. For purposes of this PRA analysis, the hour burden associated with the requirements of rule 30b2-1 has been included in the collection of information requirements of rule 30e-1 under the Investment Company Act and Form N-CSR, rather than the rule. Although the rule 30b2-1 information collection imposes no hour burden, we are, however, requesting a one hour burden for administrative purposes.

Table 1: Change in Burden Estimates

	Annual Number of Responses			Annual Time Burden (hours)			Cost Burden (dollars)		
	Previously approved	Proposed estimate	Change	Previously approved	Proposed estimate	Change	Previously approved	Proposed estimate	Change
Rule 30b2-1	1	1	0	0	1	+1	\$0	\$0	\$0

13. Cost to Respondents

Cost burden is the cost of services purchased to prepare and update reports filed pursuant to rule 30b2-1, such as for the services of independent auditors, outside counsel, and the costs associated with purchasing technology or other components used in generating, maintaining, and disclosing or providing the information. Estimates are based on the Commission's experience with the filing of registration forms and shareholder reports.

For purposes of this PRA analysis, the burden associated with the requirements of rule 30b2-1 has been included in the collection of information requirements of rule 30e-1

and Form N-CSR, rather than the rule, and, therefore, the information collection imposes no cost burden.

14. Cost to the Federal Government

The annual cost of reviewing and processing disclosure documents, including new registration statements, post-effective amendments, proxy statements, and shareholder reports of investment companies amounted to approximately \$21.2 million in fiscal year 2019, based on the Commission's computation of the value of staff time devoted to this activity and related overhead.

15. Change in Burden

This information collection imposes no hour or cost burdens; however, we are requesting a one hour burden for administrative purposes. This results in a one hour increase to the previously-approved burden estimate.

16. Information Collection Planned for Statistical Purposes

The results of any information collected will not be published.

17. Approval to Omit OMB Expiration Date

The Commission is not seeking approval to not display the expiration date for OMB approval.

18. Exceptions to Certification Statement for Paperwork Reduction Act

Submission

The Commission is not seeking an exception to the certification statement.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

The collection of information will not employ statistical methods.