

SUPPORTING STATEMENT
for the Paperwork Reduction Act Information Collection Submissions
for EDGAR Filer Access and Account Management

This submission is being made pursuant to the Paperwork Reduction Act of 1995, 44 U.S.C. § 3501 et seq., (“PRA”).

Existing Information Collection:
Form ID OMB Control Number: 3235-0328

New Request for Information Collection:
The EDGAR Filer Management Dashboard (“the dashboard”)

A. JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

On September 13, 2023, the Commission proposed rule and form amendments concerning access to and management of accounts on the Commission’s Electronic Data Gathering, Analysis, and Retrieval system (“EDGAR”) that are related to potential technical changes to EDGAR (collectively referred to as “EDGAR Next”).¹ If the potential changes are implemented, filers would be required to obtain individual account credentials and comply with certain account access and management requirements by taking action on a new filer management tool, the EDGAR Filer Management Dashboard (“the dashboard”), available on EDGAR.

Certain provisions of the proposed amendments contain “collection of information” requirements within the meaning of the PRA. We are submitting the proposed collections of information to you for review in accordance with the PRA. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Compliance with the information collection is mandatory. Responses to the information collection are not kept confidential, and there is no mandatory retention period for the information disclosed.

The title for the existing collection of information that we are proposing to amend is “Form ID” (OMB Control No. 3235-0328). Our proposal also includes a new collection of information titled “the EDGAR Filer Management Dashboard.” The amendments to Form ID and the implementation of the dashboard are designed to harness the benefits of improved technology and to modernize the EDGAR access and management functions. A detailed description of the proposed amendments, including the amendments to Form ID and the implementation of the dashboard, including the need for

¹ See EDGAR Filer Access and Account Management, Release No. 33-11232, Sept. 13, 2023 [88 FR 65524 (Sept. 22, 2023)], hereinafter referred to as, “EDGAR Next Proposing Release.”

the information and its proposed use, as well as a description of the likely respondents, can be found in Section III of the EDGAR Next Proposing Release,² and a discussion of the expected economic impact of the proposed amendments can be found in Section IV of the EDGAR Next Proposing Release.³ We discuss below the collection of information burdens associated with each initiative.

Form ID must be completed online and submitted to the Commission by all individuals, companies, and other organizations who seek access to file electronically on EDGAR. The amendments to Form ID would require an applicant for EDGAR access to undertake certain additional disclosure obligations, including most significantly: (1) designating on Form ID specific individuals the filer applicant authorizes to act as its account administrator(s) to manage its EDGAR account on the dashboard; (2) indicating the applicant's legal entity identifier ("LEI"), if any; (3) providing more specific contact information about the filer, its account administrators, its authorized individual (individual authorized to submit Form ID on the filer's behalf), and its billing contact (including mailing, business, and billing information, as applicable); (4) specifying whether the applicant, its authorized individual, person signing a power of attorney (if applicable), account administrator, or billing contact has been criminally convicted as a result of a Federal or State securities law violation, or civilly or administratively enjoined, barred, suspended, or banned in any capacity, as a result of a Federal or State securities law violation; (5) indicating whether the applicant, if a company, is in good standing with its state or country of incorporation; (6) requiring submission of a new Form ID if the applicant claims to have (i) lost electronic access to its existing CIK account or (ii) assumed legal control of a filer listed on an existing CIK account but did not receive EDGAR access from that filer; and (7) requiring those seeking access to an existing EDGAR account to upload to EDGAR the documents that establish the applicant's authority over the company or individual listed in EDGAR on the existing account. The proposed amendments would also simplify filer account management by eliminating the EDGAR password, PMAC, and passphrase.

To file on EDGAR, each filer must also comply with certain account access and management requirements by taking actions on the dashboard. As outlined above, each filer must authorize individuals to act on its behalf on the dashboard, and those individuals must have obtained individual account credentials for EDGAR in the manner specified in the EDGAR Filer Manual. Moreover, each filer, through their account administrators, would be required to: (i) authorize and maintain at least two individuals as authorized account administrators to act on the filer's behalf to manage the filer's EDGAR account, except a filer who is an individual or single-member company would be required to authorize and maintain at least one individual as an account administrator; (ii) confirm annually on EDGAR that all users, account administrators, technical administrators, and/or delegated entities reflected on the dashboard for the filer's EDGAR account are authorized by the filer, and that the filer's information on the dashboard is accurate; (iii) maintain accurate and current information on EDGAR

² See EDGAR Next Proposing Release.

³ See EDGAR Next Proposing Release.

concerning the filer's account, including but not limited to accurate corporate information and contact information (such as mailing and business addresses, email addresses, and telephone numbers); (iv) securely maintain information relevant to the ability to access the filer's EDGAR account, including but not limited to access through any EDGAR Application Programming Interfaces ("API"); and (v) if the filer chooses to use an EDGAR API, authorize at least two technical administrators to act on the filer's behalf to manage technical matters related to the filer's use of an API.

2. Purpose and Use of the Information Collections

The amendments to Form ID and the implementation of the dashboard are designed to harness the benefits of improved technology and to modernize the EDGAR access and management functions.

The information provided on Form ID allows the Commission staff to review applications for EDGAR access and, if the application is approved, assign CIKs (if the applicant does not already have a CIK) and/or access codes to applicants to permit filing on EDGAR.

If the Commission adopts the rule and form amendments, filers, through their account administrators, will be required to comply with the account access and management requirements by taking actions on the dashboard, and the role and functionality that corresponds to each authorized individual acting on behalf of the filer would be displayed on the dashboard.

3. Consideration Given to Information Technology

Form ID must be submitted, reviewed, and approved before filers may use EDGAR. As mentioned above, the dashboard is the mechanism through which electronic filers would manage their EDGAR accounts. The Commission consistently improves EDGAR information technology to facilitate the utility of EDGAR for filers, Commission staff, and the public. Further, EDGAR exists to reduce the regulatory burdens of paper filings with the Commission.

4. Duplication of Information

EDGAR is unique to the Commission; consequently, no duplication of these information collections exists.

5. Reducing the Burden on Small Entities

If adopted, the proposed amendments are expected to apply to all applicants and current EDGAR accounts and would apply to small entities to the same extent as other entities, irrespective of size. Therefore, we generally expect the nature of any benefits and cost associated with the proposed amendments to be similar for large and small entities. We note that, as discussed in the EDGAR

Next Proposing Release, all existing and new EDGAR filers will be subject to certain fixed costs to update and maintain an EDGAR account under the proposed amendments, which may result in a proportionally larger burden on small filers.

To the extent that simplifying the requirements of the proposed amendments could reduce regulatory burden on small filers, while affording small filers greater discretion as to how they manage their accounts and securely maintain their EDGAR access codes, exempting a particular group of users would hinder the Commission's effort of establishing uniform requirements for all filers and individuals acting on their behalf.

6. Consequences of Not Conducting Collection

Form ID must be submitted and approved by SEC staff in order for filers to use EDGAR, and filers and their authorized individuals will be required to take the actions necessary to manage their accounts through the dashboard.

7. Special Circumstances

There are no special circumstances in connection with these amendments.

8. Consultations with Persons Outside the Agency

The Commission has solicited comments from the public on the collection of information burdens. The Commission will receive and evaluate public comments, if any, during the comment period prior to OMB's approval.

9. Payment or Gift to Respondent

There are no payments or gifts to respondents.

10. Confidentiality

Form ID is used solely for reviewing applications for EDGAR access and permitting (or denying) access to EDGAR. The dashboard is used to manage filers' accounts on EDGAR.

11. Sensitive Questions

No information of a sensitive nature, including social security numbers, will be required under either collection of information. The information collection on Form ID collects basic Personally Identifiable Information (PII) that may include name, address, phone number, zip code, occupation, job title, email address, LEI, business and billing contact, information regarding whether certain individuals identified as part of the Form ID application have been criminally convicted as a result of a Federal or State securities law violation, or civilly or administratively enjoined, barred, suspended, or banned in any

capacity, as a result of a Federal or State securities law violation, and whether the applicant, if a company, is in good standing with its state or country of incorporation. The information collection on the dashboard collects basic PII that may include name, job title, and work address. The agency has determined that the information collections on Form ID and the dashboard do not constitute a system of record for purposes of the Privacy Act. Information is not retrieved by a personal identifier for either collection of information. In accordance with Section 208 of the E-Government Act of 2002, the agency has conducted a Privacy Impact Assessment (PIA) of EDGAR, in connection with these collections of information. The EDGAR PIA, published on March 22, 2023, is provided as a supplemental document and is also available at <https://www.sec.gov/about/privacy/pia/pia-edgar.pdf>.

12. Estimate of Respondent Reporting Burden:

Form ID

Form ID	Annual No. of Filings			Annual Time Burden (Hrs.)		
	<i>Previously approved</i>	<i>Requested Increase</i>	<i>Change</i>	<i>Previously approved</i>	<i>Requested Increase</i>	<i>Change</i>
Form ID	57,329	79,457	22,128	17,199	47,674	30,475

For purposes of the PRA, the currently approved burden includes an estimate of 57,329 Form ID filings annually and further estimates approximately 0.30 hours per response to prepare and file Form ID, for a total of 17,199 annual burden hours. Those estimates include the number of Form ID filings for filers without CIKs (48,089 filings), filers with CIKs who are seeking to regain access to EDGAR (8,836 filings), and filers with CIKs who have not filed electronically on EDGAR (404 filings).⁴ Filers are responsible for 100% of the total burden hours.

There were 79,457 Form ID filings in calendar year 2022. The estimate includes the number of filers without CIKs, filers with CIKs who have not filed electronically on EDGAR, and filers with CIKs who are seeking to regain access to EDGAR.⁵ If the proposed access changes and proposed Form ID amendments are implemented, for purposes of the PRA, we estimate that the number of Form ID filings would remain the same and that the number of hours to prepare Form ID would increase by 0.30 hours.⁶

⁴ 48,089 filings for users without CIKs + 8,836 filings for filers who are seeking to regain access to EDGAR + 404 filings for filers with CIKs who have not yet filed electronically on EDGAR = 57,329 filings.

⁵ 69,651 filings for users without CIKs + 9,390 filings for filers who are seeking to regain access to EDGAR + 416 filings for filers with CIKs who have not yet filed electronically on EDGAR = 79,457 filings.

⁶ The increase in burden would vary by applicant depending on whether certain of their responses required additional information (e.g., explaining the circumstances surrounding any of its operatives who are currently subject to Federal or State securities law investigations, proceedings, convictions, suspensions, or bars, and for

Thus, for purposes of the PRA, the estimated total number of annual Form ID filings would increase from 57,329 filings to 79,457 filings. The estimate of 0.30 hours per response would increase to 0.60 hours per response. The estimated total annual burden would increase from 17,199 hours to 47,674 hours.⁷ The estimate that the filers are responsible for 100% of the total burden hours would stay the same.

EDGAR Filer Management Dashboard

Active Filers			Burden Hours		Total Annual Burden Hours
Entities	149,000	x	1	=	149,000
Individuals	71,000	x	1	=	71,000
					220,000

For purposes of the PRA, we estimate that each filer would spend approximately one hour setting up the dashboard, and approximately one hour per annum managing the filer’s account on the dashboard. This burden would vary across filers depending on the size of the filer, the number of users, account administrators, technical administrators, and delegated entities authorized by the filer, as well as the amount of annual staff turnover for those individuals and entities, among other factors. For a small number of filers, the annual burden could significantly exceed our estimate (e.g., filing agents who may have a large number of authorized individuals, as well as multiple accepted delegations and user groups for which delegated users would need to be maintained). On the other hand, for the vast majority of filers, the annual burden would presumably be less than our estimate because we expect most filers to have a small number of authorized individuals and experience little or no annual turnover with regard to those individuals.⁸ Consequently, the anticipated total annual burden attributed to the dashboard would be approximately 220,000 burden hours.⁹

applicants seeking access to an existing CIK account, providing the documents that establish the applicant’s authority over the company or individual currently listed in EDGAR as corresponding to the existing CIK account).

⁷ 79,457 filings x 0.60 hours/filing = 47,674 hours.

⁸ A filer survey conducted by a filing agent found that at least 64% of respondents planned to have three or fewer account administrators, and 96% of respondents planned to have fewer than 20 users. See Workiva Comment Letter (Nov. 30, 2021). Moreover, since filers are not required to authorize users, technical administrators, or delegations, filers who did not choose to authorize such individuals or third parties would not have any associated burdens.

13. Estimate of Total Annualized Cost Burden

We estimate that the filer is responsible for 100% of the total reporting burden imposed by Form ID and the dashboard, and there is no additional cost associated with either information collection.

14. Costs to Federal Government

The Commission has no specific information available concerning the cost for staff processing Form ID or staff oversight of the dashboard.

15. Reason for Change in Burden

As explained in further detail in Items 1, 2, 12 and 13 above, the proposed rule and form amendments would result in changes in the burden for Form ID and would newly require that each filer comply with the account access and management requirements by taking actions on the dashboard. The amendments to Form ID, and the implementation of the dashboard, are designed to harness the benefits of improved technology and to modernize the EDGAR access and management functions.

For purposes of the PRA, we estimate that the proposed amendments would result in an annual increase of 22,128 Form ID filings, an increase of 30,475 burden hours for Form ID, and no change to the cost burden.

For purposes of the PRA, we estimate that the proposed amendments would newly require each filer to spend approximately one hour administering the filer's account on the dashboard. Consequently, 149,000 entity filers would expend 149,000 annual burden hours, and 71,000 individual filers would expend 71,000 annual burden hours on the dashboard, for a total of 220,000 annual burden hours, and no additional cost burden.

16. Information Collections Planned for Statistical Purposes

The information collections are not planned for statistical purposes.

17. Approval to Omit OMB Expiration Date

We request authorization to omit the expiration date on the electronic version of Form ID and the dashboard. Including the expiration date on the electronic version of these information collections will result in increased costs, because the need to make changes to these collections may not follow the applications' scheduled version release dates. The OMB control number will be displayed.

⁹ 149,000 active entity filers on EDGAR x 1 hour = 149,000 burden hours. 71,000 active individual filers on EDGAR x 1 hour = 71,000 burden hours. 149,000 burden hours + 71,000 burden hours = 220,000 total annual burden hours.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions for the Paperwork Reduction Act submissions.

B. STATISTICAL METHODS

The information collections do not employ statistical methods.