

Short Statement for EDGAR Filer Access and Account Management

On September 13, 2023, the Commission proposed rule and form amendments concerning access to and management of accounts on EDGAR that are related to potential technical changes to EDGAR (collectively referred to as “EDGAR Next”).¹ If the proposed rule and form changes are adopted, 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. Moreover, certain additional disclosure obligations would be required on the Form ID application for access.

The proposed revisions to Form ID also would result in a more uniform and secure process for requesting EDGAR access by requiring submission of a new Form ID if the applicant claims to already have an identification number (CIK) but no longer has access to EDGAR. The proposed amendments would also simplify filer account management by eliminating certain EDGAR access codes that would no longer be necessary due to the use of individual account credentials.

The EDGAR Next proposed rule and form amendments also include implementation of the dashboard, an interactive function on EDGAR where electronic filers would manage their EDGAR accounts and where individuals that electronic filers would authorize² could take relevant actions for the electronic filers’ accounts.

If the proposed access changes and proposed Form ID amendments are implemented, for purposes of the Paperwork Reduction Act, we estimate that the number of Form ID filings would increase from the currently approved burden of 57,329 filings to 79,457 filings. The currently approved 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.³ The estimate that the filers are responsible for 100% of the total burden hours would stay the same.

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

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

¹ See EDGAR Filer Access and Account Management, Release No. 33-11232, Sept. 13, 2023 [88 FR 65524 (Sept. 22, 2023)].

² Each authorized individual must have obtained individual account credentials for EDGAR in the manner to be specified in the EDGAR Filer Manual.

³ 79,457 filings x 0.60 hours/filing = 47,674 hours.

individuals and entities the filer has authorized to act on the dashboard on its behalf, as well as the amount of annual staff turnover for those individuals and entities, among other factors. Consequently, the anticipated total annual burden attributed to the dashboard would be approximately 220,000 burden hours.⁴

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

⁴ 149,000 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.