

**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-Application for EDGAR Access 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 27, 2024, the Commission adopted 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 certain technical changes to EDGAR (collectively referred to as “EDGAR Next”).<sup>1</sup> The rule and form amendments require filers 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 our rules and forms that will be affected by the final amendments contain “collection of information” requirements within the meaning of the PRA. The Commission published a notice requesting comment on changes to these collection of information requirements in the EDGAR Filer Access and Account Management Proposing Release,<sup>2</sup> and submitted these requirements 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 contained in the final amendments is “Form ID - Application for EDGAR Access” (OMB Control No. 3235-

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<sup>1</sup> *See* EDGAR Filer Access and Account Management, Release No. 33-11313, Sept. 27, 2024 [89 FR 106168 (Dec. 27, 2024)], hereinafter referred to as, “EDGAR Next Adopting Release.”

<sup>2</sup> *See* EDGAR Filer Access and Account Management, Release No. 33-11232, Sept. 13, 2023 [88 FR 65524 (Sept. 22, 2023)] and March 12, 2024 [89 FR 19292 (Mar. 18, 2024)].

0328).<sup>3</sup> The final amendments also include 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 final amendments, including the amendments to Form ID and the implementation of the dashboard, including the need for the information and its proposed use, as well as a description of the likely respondents, can be found in Section II of the EDGAR Next Adopting Release,<sup>4</sup> and a discussion of the expected economic impact of the final amendments can be found in Section IV of the EDGAR Next Adopting Release.<sup>5</sup> We discuss below the collection of information burdens associated with each initiative.

Form ID must be completed online and submitted to the Commission by individuals, companies, and other organizations that seek access to file electronically on EDGAR. The amendments to Form ID will require an applicant for EDGAR access to undertake certain additional obligations, including most significantly: (1) designating on Form ID specific individuals the applicant authorizes as its account administrator(s) to manage its EDGAR account on a dedicated dashboard on EDGAR; (2) indicating the applicant’s legal entity identifier (“LEI”), if any; (3) providing more specific contact information about the applicant, its account administrator(s), its authorized individual (the individual authorized to sign Form ID on the filer’s behalf as defined in the EDGAR Filer Manual), 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 for both prospective filers seeking access to EDGAR for the first time and existing filers that must apply for access to EDGAR because they (i) lost electronic access to their existing EDGAR account or (ii) are the legal successor of the filer named on the existing EDGAR account but did not receive EDGAR access from that filer, or (iii) are broker-dealers or “paper filers” seeking electronic access for the first time in order to file electronically on EDGAR; 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 final amendments will also simplify filer account management by eliminating the EDGAR password, PMAC, and passphrase.

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<sup>3</sup> The current title for the collection of information is Form ID – EDGAR Password, however we are requesting that the title be changed to Form ID – Application for EDGAR Access.

<sup>4</sup> *See* EDGAR Next Adopting Release.

<sup>5</sup> *See* EDGAR Next Adopting Release.

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 will be required to 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 its account administrators, will 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 must 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 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 ("APIs"); and (v) if the filer chooses to connect to an EDGAR API, authorize, through its account administrator(s) at least two technical administrators to manage technical matters related to the filer's connection to the API, or the filer may use the API connections and filer API tokens of its delegated entity so long as the delegated entity is in compliance with the technical administrator and other API requirements.

## **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 granted, assign CIKs (if the applicant does not already have a CIK) and access codes to applicants to permit filing on EDGAR.

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 individual authorized by the filer will be displayed on the dashboard.

**3. Consideration Given to Information Technology**

Form ID must be submitted, reviewed, and granted before filers may use EDGAR. As mentioned above, the dashboard is the mechanism through which electronic filers will manage their EDGAR accounts. The Commission consistently improves EDGAR information technology to facilitate the utility of EDGAR for filers, Commission staff, and the public.

**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**

The final rule and form amendments apply to all applicants and current EDGAR accounts and will 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 amendments to be similar for large and small entities. We note that, as discussed in the EDGAR Next Adopting Release, all existing and new EDGAR filers will be subject to certain fixed costs to update and maintain an EDGAR account under the final amendments, which may result in a proportionally larger burden on small filers.

To the extent that simplifying the requirements of the final rule and form amendments could reduce regulatory burden on small filers, while affording small filers greater discretion as to how they manage their accounts and securely maintain EDGAR access, 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 granted by SEC staff in order for filers to use EDGAR, and filers and individuals authorized by the filer 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 has evaluated the public comments received 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 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 constitute a system of record for purposes of the Privacy Act which are covered by the SEC-33 SORN (General Information Technology Records)<sup>6</sup> and by an existing Privacy Act statement. Information on Form ID is retrievable by personal identifiers, including, but not limited to names. Information on the dashboard can be searched and retrieved by, among other things, name, Login.gov email address, and CIK (which can be linked to an individual). 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>.

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<sup>6</sup> 85 FR 85440 (Jan. 27, 2021).

**12. Estimate of Respondent Reporting Burden:**

**Form ID**

Form ID	Annual No. of Filings			Annual Time Burden (Hrs.)		
	<i>Previously approved</i>	<i>Requested</i>	<i>Change</i>	<i>Previously approved</i>	<i>Requested</i>	<i>Change</i>
Form ID	66,519	73,600	7,081	18,578	44,160	25,582

For purposes of the PRA, the currently approved burden includes an estimate of 66,519 Form ID filings annually and further estimates approximately 0.279289 hours per response to prepare and file Form ID, for a total of 18,578 annual burden hours. Filers are responsible for 100% of the total burden hours.

There were 73,600 Form ID filings in calendar year 2023. 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.<sup>7</sup> For purposes of the PRA, we estimate that the number of Form ID filings under the final amendments will remain the same and that the number of hours to prepare Form ID will increase by 0.3 hours.<sup>8</sup>

Thus, for purposes of the PRA, the estimated total number of annual Form ID filings will increase from 66,519 filings to 73,600 filings. The estimate of 0.279289 hours per response will increase to 0.579289 hours per response, which for administrative convenience, we are rounding up to 0.6. The estimated total annual burden will increase from 18,578 hours to 44,160 hours.<sup>9</sup> The estimate that the filers are responsible for 100% of the total burden hours will remain the same.

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<sup>7</sup> 63,676 filings for users without CIKs + 9,602 filings for filers who are seeking to regain access to EDGAR + 322 filings for filers with CIKs who have not yet filed electronically on EDGAR = 73,600 filings.

<sup>8</sup> The increase in burden will vary by applicant depending on whether certain of their responses required additional information (e.g., explaining the circumstances surrounding any specified individuals who are currently subject to Federal or State securities law investigations, proceedings, convictions, suspensions, or bars, and for 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).

<sup>9</sup> 73,600 filings x 0.60 hours/filing = 44,160 hours.

## EDGAR Filer Management Dashboard

	Burden Hours Per Filer in Year 1	Burden Hours Per Filer in Year 2	Burden Hours Per Filer in Year 3	Total Burden Hours Per Filer	Average Burden Hours Per Filer Over 3 Years	Number of Active Filers	Aggregate Burden Hours for Active Filers
Dashboard set up	1	0	0	1	0.3	208,000	62,400
Dashboard management	1	1	1	3	1	208,000	208,000
All dashboard responsibilities	2	1	1	4	1.3	208,000	270,400

For purposes of the PRA, we estimate that each filer will spend approximately one hour in the first year setting up the dashboard, and additionally, on average, approximately one hour per annum managing the filer’s account on the dashboard. This burden will 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 may significantly exceed our estimate (e.g., filing agents that may authorize a large number of individuals, and that have multiple accepted delegations and user groups for which delegated users will need to be maintained). On the other hand, for the vast majority of filers, the annual burden will presumably be less than our estimate because we expect most filers will authorize a small number of individuals and will experience little or no annual turnover with regard to those individuals.<sup>10</sup> Consequently, the anticipated aggregate average annual burden attributed to the dashboard for all filers will be approximately 270,400 burden hours, based on a three-year average burden of 1.3 hours per filer.<sup>11</sup>

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<sup>10</sup> A filer survey conducted by a filing agent found that at least 64% of its respondents planned to have three or fewer account administrators, and 96% of its 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.

<sup>11</sup> The estimate of 1.3 hours per filer is based on the following calculations: For dashboard set up, 1 hour in the first year ÷ 3 years = 0.3 hours on average; for dashboard management, 1 hour per year ÷ 3 years = 1 hour on average; 0.3 hours for dashboard set up + 1 hour for dashboard management = 1.3 hours on average for all dashboard responsibilities. The estimate of 270,400 hours is based on the following calculations: 0.3 hours for dashboard set up x 208,000 filers = 62,400 hours; 1 hour for dashboard management x 208,000 filers = 208,000 hours; 62,400 hours + 208,000 hours = 270,400 hours.

**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 final rule and form amendments will result in changes in the burden for Form ID and will 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 final amendments will result in an annual increase of 7,081 Form ID filings, an increase of 25,582 burden hours for Form ID, and no change to the cost burden.

For purposes of the PRA, we estimate that the final amendments will newly require each filer to spend approximately one hour in the first year setting up the dashboard, and additionally, on average, approximately one hour per annum managing the filer's account on the dashboard. Consequently, the anticipated aggregate average annual burden attributed to the dashboard for all filers will be approximately 270,400 burden hours, based on a three-year average burden of 1.3 hours per filer, 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.

**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.

**SHORT STATEMENT**  
**FORM ID – APPLICATION FOR EDGAR ACCESS**

The final rule and form amendments will result in changes in the burden for Form ID. Form ID must be completed online and submitted to the Commission by individuals, companies, and other organizations that seek access to file electronically on EDGAR. The amendments to Form ID will require an applicant for EDGAR access to undertake certain additional obligations. The amendments to Form ID 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 final amendments will result in an annual increase of 7,081 Form ID filings, an increase of 25,582 burden hours for Form ID, and no change to the cost burden.

**SHORT STATEMENT  
THE EDGAR FILER MANAGEMENT DASHBOARD**

The final rule and form amendments will newly require that each filer comply with certain account access and management requirements by taking actions on the dashboard. The implementation of the dashboard is 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 final amendments will newly require each filer to spend approximately one hour in the first year setting up the dashboard, and additionally, on average, approximately one hour per annum managing the filer's account on the dashboard. Consequently, the anticipated aggregate average annual burden attributed to the dashboard for all filers will be approximately 270,400 burden hours, based on a three-year average burden of 1.3 hours per filer, and no additional cost burden.