

SUPPORTING STATEMENT
For the Paperwork Reduction Act Information Collection Submission for
Form ID – Application for EDGAR Access

A. JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

Regulation S-T (17 CFR Part 232 *et. seq.*), governs the electronic submission of documents filed or otherwise submitted to the Securities and Exchange Commission (“Commission”) through the Commission’s Electronic Data Gathering, Analysis, and Retrieval system (“EDGAR”). In order to facilitate its electronic filing requirements, the Commission developed procedures and forms unique to EDGAR, including the Form ID application for EDGAR access. The purpose of Form ID is to allow SEC staff to determine whether to provide access to file electronically on EDGAR, in accordance with Regulation S-T, in a manner that is secure and facilitates the process of maintaining digital records.

2. Purpose and Use of the Information Collection

The information provided on Form ID allows the Commission staff to review applications for EDGAR access and, if the application is granted, assign an identification number referred to as a Central Index Key (“CIK”) (if the applicant does not already have a CIK) and/or access codes to applicants, to permit filing on EDGAR. Form ID is essential to EDGAR security.

3. Consideration Given to Information Technology

Form ID must be submitted, reviewed, and granted before filers may use EDGAR. The Commission consistently improves EDGAR information technology to facilitate the utility of EDGAR for filers, Commission staff, and the public. Further, EDGAR is designed 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 Form ID exists.

5. Reducing the Burden on Small Entities

EDGAR has been designed to accommodate small entities to the greatest degree possible while still providing for the public electronic dissemination of information.

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 EDGAR Filer Management Dashboard available on EDGAR.

7. Special Circumstances

There are no special circumstances.

8. Consultations with Persons Outside the Agency

The Commission has solicited comments from the public on the collection of information burdens. No comments were received.

9. Payment or Gift to Respondent

No payment or gift has been provided to any respondents.

10. Confidentiality

Form ID is used solely for reviewing applications for EDGAR access and permitting (or denying) access to EDGAR.

11. Sensitive Questions

No information of a sensitive nature, including social security numbers, will be required under this 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 agency has determined that the information collection on Form ID constitutes a system of record for purposes of the Privacy Act which is covered by the SEC-33 SORN (General Information Technology Records)¹ and by an existing Privacy Act statement. Information on Form ID is retrievable by personal identifiers, including, but not limited to, names. 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 this collection of information. The EDGAR PIA, published on February 18, 2025, is provided

¹ 85 FR 85440 (Jan. 27, 2021).

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

We estimate that there are 73,600 filings annually on Form ID and that it takes 0.6 hours to prepare Form ID, for a total annual burden of 44,160 hours. It is estimated that the filers are responsible for 100% of the 44,160 burden hours. The estimated hours are made solely for the purposes of the Paperwork Reduction Act.

| 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 | 73,600 | 73,600 | 0 | 44,160 | 44,160 | 0 |

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 there is no additional cost associated with the information collection.

14. Costs to Federal Government

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

15. Reason for Change in Burden

There is no change in burden.

16. Information Collections Planned for Statistical Purposes

The information collection is 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. Including the expiration date on the electronic version of this information collection will result in increased costs, because the need to make changes to this collection may not follow the application’s 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 collection does not employ statistical methods.