



U.S. Securities and Exchange Commission

PAPERWORK REDUCTION ACT SUPPORTING STATEMENT

for the Extension of
Rule 203-2 & Form ADV-W
OMB Control Number 3235-0313

The U.S. Securities and Exchange Commission (“Commission” or SEC) submits this information collection request (ICR) pursuant to the Paperwork Reduction Act of 1995 (PRA), 44 U.S.C. Section 3501 et seq., with the following justification.

1. Necessity of Information Collection

Rule 203-2 under the Investment Advisers Act of 1940 establishes procedures for an investment adviser to withdraw its registration, or a pending registration application, with the Securities and Exchange Commission (“Commission” or “SEC”), and requires every person withdrawing from investment adviser registration with the Commission to file Form ADV-W electronically on the Investment Adviser Registration Depository (“IARD”).

The potential respondents to this information collection are all investment advisers registered with the Commission that withdraw their registrations or pending registrations with the Commission. The collection of information is necessary to ensure that the Commission and the public are notified when each of these investment advisers withdraws its SEC registration.

The title of the affected collection of information is: “Rule 203-2 and Form ADV-W under the Investment Advisers Act of 1940.” Its OMB control number is 3235-0313. 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. This collection of information is found at 17 CFR 275.203-2 and 17 CFR 279.2 and is mandatory.

2. Purpose and Use of Information Collection

Form ADV-W is used to withdraw an investment adviser's registration with the Commission. The purpose of the information collection is to notify the Commission and the public when each investment adviser withdraws its SEC registration. An adviser must keep a copy of its filed Form ADV-W in its records for the periods set forth in rule 204-2 under the Investment Advisers Act of 1940.

3. Use and Consideration of Information Technology

All SEC-registered investment advisers are required to file Part 1 and Part 2A of Form ADV, the form used to register as an investment adviser, electronically through the IARD. The IARD is an Internet-based system that investment advisers access through computers in their offices, without the need for specialized software or hardware. The information investment advisers submit to the IARD is stored in a database, and the general public has Internet-access to the data. The IARD also permits investment advisers to meet state notice filing requirements electronically. In conjunction with mandating electronic filing of investment adviser registration forms, the Commission also mandated electronic filing of the form used to withdraw from registration. To withdraw an investment adviser registration, rule 203-2 requires the electronic filing of Form ADV-W on the IARD.

4. Identifying and Minimizing Duplication

The collection of information requirements of the rule and form are not duplicated elsewhere.

5. Effect on Small Entities

The requirements of rule 203-2 and Form ADV-W are the same for all investment advisers registered with the Commission, including small entities. It would defeat the purpose of the rule to exempt small entities from these requirements.

6. Consequences of Not Conducting Collection and Obstacles to Reducing Burden

Rule 203-2 requires an adviser to notify the Commission when it is withdrawing its SEC registration. If the Commission did not collect this information, the Commission and the public would be unaware that an adviser had gone out of business or was ineligible to remain registered with the Commission.

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

The collection of information imposes no additional requirements regarding record retention.

8. Public Comment and Consultations Outside the Agency

The Commission and the staff of the Division of Investment Management continue to participate in an ongoing dialogue with representatives of the investment adviser profession 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 facing the industry.

The Commission requested public comments on the collection of information requirements in rule 203-2 and Form ADV-W before submitting this request for extension and approval to the OMB. The Commission received no comments in response to its request.

9. Payment or Gift to Respondents

None.

10. Assurance of Confidentiality and Privacy

The information collected pursuant to rule 203-2 and Form ADV-W are filings with the Commission. These filings are not kept confidential.

11. Collection Questions of a Sensitive Nature

Not applicable.

12. Estimated Time Burden and its Cost Equivalent

The current approved total estimated collection of information burden imposed by rule 203-2 and Form ADV-W is 739 hours per year. This burden was based on estimates, derived from past filing volume, that approximately 1,416 respondents filed Form ADV-W annually, that approximately 54 percent of those advisers ceased operations and completed the entire form to withdraw from all jurisdictions in which they are registered (full withdrawal), and that the remaining 46 percent withdrew from some, but not all, of the jurisdictions in which they were registered and omitted certain items from the form (partial withdrawal). Compliance with the requirement to complete Form ADV-W imposes a total burden of approximately 0.75 hours (45 minutes) for an adviser filing for full withdrawal and approximately 0.25 hours (15 minutes) for an adviser filing for partial withdrawal, for a total of 739 hours.

We anticipate that the burden for this information collection is expected to increase slightly due to a higher number of respondents filing Form ADV-W.

For purposes of this Paperwork Reduction Act extension, the Commission staff estimates based on the number of Form ADV-W filings received in the past calendar year that approximately 1,553 advisers file Form ADV-W each year. Of those advisers, approximately 880 advisers (57%) filing for withdrawal file for full withdrawal and approximately 673 advisers

(43%) file for partial withdrawal.¹ Compliance with the requirement to complete Form ADV-W imposes a total burden of approximately 0.75 hours (45 minutes) for an adviser filing for full withdrawal and approximately 0.25 hours (15 minutes) for an adviser filing for partial withdrawal. Based on these estimates and estimated total responses, we estimate the total annual hours to be 828.25 hours.²

We anticipate that investment advisers would likely utilize a combination of compliance professionals and clerical staff to complete Form ADV-W and file it with the Commission. The Commission estimates the hourly wage rate for a financial examiner to be \$365 per hour,³

¹ This information was based on data collected from Form ADV-Ws filed through the IARD during 2025.

² $(880 \text{ full ADV-Ws} \times 0.75 \text{ hours}) + (673 \text{ partial ADV-Ws} \times 0.25 \text{ hours}) = 828.25 \text{ hours}$.

³ To calculate the occupational hourly rates used in this release, the Commission uses occupational mean hourly wage data from the Occupational Employment and Wage Statistics (OEWS) program of the Bureau of Labor Statistics (BLS) for “Securities, Commodity Contracts, and Other Financial Investments and Related Activities” (NAICS 523). See *Occupational Employment and Wage Statistics*, U.S. Bureau of Labor Statistics, <https://www.bls.gov/oes/>; see also *Standard Occupational Classification*, U.S. Bureau of Labor Statistics, <https://www.bls.gov/soc/> (describing occupational classification system used by BLS); Exec. Off. of the President, Off. of Mgmt. & Budget, North American Industry Classification System (2022), available at https://www.census.gov/naics/reference_files_tools/2022_NAICS_Manual.pdf (describing the industry classification system used by BLS and other agencies). The mean hourly wage for each occupation is adjusted for changes in the seasonally adjusted employment cost index for private wages and salaries between the data reference period and when the data are released by BLS. See *Employment Cost Index*, U.S. Bureau of Labor Statistics, <https://www.bls.gov/eci/>. The adjusted mean hourly wage is then multiplied by a factor that accounts for nonwage costs borne by employers, such as bonuses, benefits, and overhead. This factor is calculated as an average over the 10 most recently available years of data of the ratio of the Bureau of Economic Analysis’s annual gross output data for NAICS 523 to total annual wages across all occupations for NAICS 523 in the OEWS data. See *Gross Output by Industry*, U.S. Bureau of Economic Analysis, <https://www.bea.gov/data/industries/gross-output-by-industry>; *Occupational Employment and Wage Statistics*, U.S. Bureau of Labor Statistics, <https://www.bls.gov/oes/>. The final product is the occupational hourly rate. See generally Updated Methodology for Calculating Occupational Hourly Rates (Dec. 19, 2025), available at <https://www.sec.gov/files/method-occupational-hourly-rates.pdf>.

including benefits, and the hourly wage rate for a general office clerk to be \$144 per hour.⁴ An investment adviser filing for full withdrawal would utilize an estimated 50% professional time and 50% clerical time. For each full withdrawal, the estimated cost would be approximately \$191 per withdrawal,⁵ or approximately \$168,080 in total.⁶ It is estimated that an investment adviser filing for partial withdrawal would utilize only clerical staff. For each partial withdrawal, the estimated cost would be approximately \$36 per withdrawal,⁷ or approximately \$24,228 in total.⁸ Accordingly, the Commission staff estimates the total annual cost of Form ADV-W to be \$192,308.⁹

Table 1: Annual No. of Form ADV-W Submissions

	Annual No. of Form ADV-W Submissions		
	Previously Approved	Requested	Change
Form ADV-W's Submitted	1,416	1,553	137

Table 2: Annual Time Burden of Form ADV-W Submissions

	Annual Time Burden of Form ADV-W Submissions (Hrs.)		
	Previously Approved	Requested	Change
Time Burden for All ADV-W Submitted	739	828.25	89.25

⁴ See *supra* footnote 3.

⁵ $((.75 \text{ hours} \times .5) \times \$365/\text{hour}) + ((.75 \text{ hours} \times .5) \times \$144/\text{hour}) = \$190.88.$

⁶ $\$191 \times 880 = \$168,080.$

⁷ $.25 \text{ hours} \times \$144/\text{hour} = \$36.$

⁸ $\$36 \times 673 = \$24,228.$

⁹ $\$168,080 + \$24,228 = \$192,308.$

Table 3: Annual Cost Burden of Form ADV-W Submissions

	Annual Cost Burden of Form ADV-W Submissions (\$)		
	Previously Approved	Requested	Change
Cost Burden for All ADV-W's Submitted	\$122,382	\$192,308	\$69,926

13. Estimated Additional Cost Burden

There is no cost burden other than the cost of the hour burden described above.

14. Annual Cost to the Federal Government

The Commission is in the process of revising its methodology to estimate annualized costs to the Federal government for all of the Commission's collections of information. The Commission anticipates that future extensions of this collection of information will reflect the revised methodology.

15. Reasons for Changes in Burden Estimates

The revised annual time burden for rule 203-2 and Form ADV-W is estimated to be 828.25 hours. This annual time burden represents an increase of 89.25 hours from the current approved burden, which is attributable primarily to the fact that more investment advisers have filed Form ADV-W in recent staff experience.¹⁰

16. Plans for Publishing Results

Not applicable.

¹⁰ 828.25 current burden hours – 739 revised approved burden hours = 89.25 hours.

17. Approval to Omit Display of OMB Expiration Date

Not applicable.

18. Exceptions to the Certification for Paperwork Reduction Act Submissions

Not applicable.