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Client Alert: EDGAR Next Amendments

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On September 27, 2024, the United States Securities and Exchange Commission (SEC) adopted “**EDGAR Next**,” a collection of rule and form amendments intended to streamline access to, and management of, accounts on the SEC’s filing portal, the Electronic Data Gathering, Analysis, and Retrieval (EDGAR) system. The EDGAR Next amendments became effective on March 24, 2025.

BACKGROUND / HISTORY

EDGAR is the current system through which filers submit filings required by various federal securities laws to the SEC. Historically, EDGAR assigned each filer a set of access codes to be used for the purpose of making submissions on the filer’s behalf, including central index keys, (CIKs), a password, passphrase, CIK confirmation code (CCC), and password modification authorization code (PMAC) (collectively, the EDGAR Codes). A first-time filer obtains these EDGAR Codes by submitting a Form ID application, which sets up the filer’s account.

KEY DATES:

- Filers that have password-based EDGAR access credentials as of **March 21, 2025**, referred to here as “existing filers,” will have until **September 12, 2025** to comply with the amendments.
- All applicants for new EDGAR account filing access on or after **March 24, 2025**, referred to here as “new filers,” must immediately comply with all EDGAR Next amendments.
- On **March 24, 2025**, filers were able to begin enrollment on the new dashboard on the EDGAR Filer Management website (the EDGAR Next Dashboard).
- Beginning **September 15, 2025**, enrollment on the EDGAR Next Dashboard and compliance with EDGAR Next amendments will be required in order to submit filings (i.e., filers should enroll in EDGAR Next on the EDGAR Next Dashboard by **September 15, 2025** to avoid interruption or delays in the submission of any SEC filings).
- On **December 19, 2025**, all filers (including existing filers) that have not enrolled in EDGAR Next or received access through submission of an amended Form ID must submit a new Form ID to request access to their existing accounts.

KEY CHANGES:

- The EDGAR Next Dashboard is where filers may enroll in EDGAR Next and where individuals or entities requiring access to files on EDGAR may submit the Form ID access application.

- Access to the EDGAR Filer Management website (including the EDGAR Next Dashboard) will require Login.gov individual account credentials and multifactor authentication. Existing filers will also need current CIK, passphrase, and CCC to enroll.
- EDGAR Next will continue using CIKs and CCCs but will no longer assign passwords, PMACs, and passphrases.
- To access an EDGAR account, filers, or individuals authorized to file on the filer's behalf, will need to log in to the EDGAR Filer Management website using the credentials obtained from Login.gov, the filer's CIK, and CCC.
- Form ID as amended is effective and available on the EDGAR Next Dashboard. Entities and individuals who do not have EDGAR access and need to file on EDGAR must submit Form ID on the EDGAR Filer Management website. Changes to the Form ID include the following:
 - The Form ID is required to be notarized. If an administrator submits a Form ID via a Power of Attorney, the Power of Attorney must now also be notarized.
 - The Form ID application now requires the applicant to attest that the Company is in good standing in its home jurisdiction.
 - Each account administrator and applicant must attest to the absence of any securities violations.
- Unless an entity is a single member organization, the SEC requires **two** account administrators. An applicant may enroll itself or may select anyone it trusts to enroll it, including but not limited to the applicant's employee, filing agent or law firm, or other trusted entity or individual. **The individual who enrolls the applicant/filer must have Login.gov individual account credentials.**

Due to these substantial changes, short timeframes to complete various SEC filings, and the consequences of filing late, Shumaker recommends existing filers take the initiative to comply with EDGAR Next (i.e., obtain Login.gov credentials and enroll on the EDGAR Next Dashboard) as soon as possible. For new filers, Shumaker also recommends beginning the process to open an EDGAR account as quickly as possible. Instructions on how to obtain Login.gov credentials can be found [here](#), and instructions on how to enroll can be found [here](#). For new filers, further instruction and explanation regarding the process for the new Form ID Application for EDGAR Next access can be found in detail [here](#).

Should you have any questions regarding the contents of this alert, please do not hesitate to contact a member of Shumaker's Corporate, Tax and Transactions Service Line.