

ICI Statement on SEC Adoption of New N-PORT Reporting and Liquidity Risk Management Guidance

Washington, DC, August 28, 2024—Today, Investment Company Institute (ICI) President and CEO Eric Pan released the following statement regarding the Securities and Exchange Commission’s (SEC) vote to adopt changes to Form N-PORT reporting requirements and liquidity risk management program guidance.

“ICI has raised serious concerns about moving portfolio holdings disclosure on Form N-PORT from quarterly to monthly, as this will open fund managers to a greater risk of predatory trading that will harm fund shareholders, without any corresponding benefit. ICI has also questioned the SEC’s requirement to have funds file these holdings within 30 days of month end given the volume of information required and the SEC’s history of data security breaches. Additionally, the Commission continues to give little consideration to the disproportionate burden of its rulemaking on smaller fund complexes. The SEC should have repropose the new reporting requirements to ensure adequate public comment on these concerns.

“We also will review today’s new liquidity risk management program guidance to understand how it will impact funds and their shareholders. It is important to note that funds currently have robust liquidity risk management programs as a matter of practice and existing regulatory requirements.”