

# Privacy Analysis Worksheet for Information Collections (ICs) and Forms

Form N-1A

## Contact Information

### Division or Office Information Collections Contact

**Name:** Amanda Wagner  
**Office/Division:** Division of Investment Management  
**Phone Number:** (202) 551-6762

## Section 1: Information Collection Overview and Purpose

### 1. Collection Title Type

Form N-1A under the Securities Act of 1933 and under the Investment Company Act of 1940, registration statement of open-end management investment companies

### 2. Collection Status

- ☐ This is a new collection  
☒ This is a revision.  
☐ This is an extension of a PRA (if applicable)

OMB Control #: 3235-0307

OMB Expiration Date: 7/31/2026

Date of last PAW (if applicable) 9/23/2023

### 3. Describe the purpose of the Information Collection

- a. Describe the purpose of the information collection. *Please provide a general description of the purpose, including how it supports the SEC mission, in a way a non-technical person could understand (you may use information from the Supporting Statement if the collection is related to a PRA). If this is an updated PAW, please specifically describe what changes or upgrades are triggering the update to this PAW. Please attach a copy of the PRA Supporting Statement with your submission.*

Form N-1A is the form used by open-end management investment companies (“funds”) to register under the Investment Company Act of 1940 (“Investment Company Act”) and/or to register their securities under the Securities Act of 1933 (“Securities Act”). Section 5 of the Securities Act requires the filing of a registration statement prior to the offer of securities to the public and that the statement be effective before any securities are sold, and Section 8 of the Investment Company Act requires a fund to register as an investment company. Form N-1A also permits funds to provide investors with a prospectus and a statement of additional information (“SAI”) covering essential information about the fund when it makes an initial or additional offering of its securities. Section 5(b) of the Securities Act requires that investors be provided with a prospectus containing the information required in a registration statement prior to the sale or at the time of confirmation or delivery of the securities.

- b. List the SEC authorities to collect, store, and use this information.  
15 U.S.C. sections 77e, and 80a-8

## Section 2: Describe the Information Collection

### 1. Who does the Information Collection relate to (the record subject)? Check all that apply

- ☒ Members of the public  
☒ U.S. citizens or lawful permanent residents  
☒ Non-U.S. Persons  
☐ Federal Employees  
☐ Contractors  
☐ Business Entity (i.e., information collection does not relate to individuals. The business entity is the record subject.)  
Is contact information required? (e.g. name or signature on behalf of entity)

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- ☐ Yes - Skip to Section 4 and submit PAW to [pia@sec.gov](mailto:pia@sec.gov) if the only applicable record subject.
- ☐ No - Skip to Section 4 and submit PAW to [pia@sec.gov](mailto:pia@sec.gov) if the only applicable record subject.

## 2. Who will complete or submit the Information Collection? *Check all that apply.*

- ☐ The record subject of the form (e.g., the individual applicant)
- ☐ Representative (other individual/entity/organization that is NOT the record subject)
- Please describe*

## 3. What media is used? *Check all that apply.*

- ☒ Paper
- ☒ Electronic (e.g., fillable PDF)
- ☐ Online web form (available and submitted via the Internet)
- Provide link:

## 4. What information is collected about the record subject? *(Check all that apply)*

### a. Identifying Numbers

- |   |  |   |
|---|--|---|
| <input type="checkbox"/> Social Security Number | <input type="checkbox"/> Alien Registration      | <input type="checkbox"/> Financial Accounts     |
| <input type="checkbox"/> Taxpayer ID            | <input type="checkbox"/> Driver's License Number | <input type="checkbox"/> Financial Transactions |
| <input type="checkbox"/> Employee ID            | <input type="checkbox"/> Passport Information    | <input type="checkbox"/> Vehicle Identifiers    |
| <input type="checkbox"/> File/Case ID           | <input type="checkbox"/> Credit Card Number      | <input type="checkbox"/> Employer ID            |
| <input type="checkbox"/> Other:                 |  |   |

List the *specific authority* to collect SSN, if applicable.

### b. General Personal Data

- |  |  |  |
|--|--|--|
| <input checked="" type="checkbox"/> Name           | <input type="checkbox"/> Date of Birth     | <input type="checkbox"/> Marriage Records      |
| <input type="checkbox"/> Maiden Name               | <input type="checkbox"/> Place of Birth    | <input type="checkbox"/> Financial Information |
| <input type="checkbox"/> Alias                     | <input type="checkbox"/> Home Address      | <input type="checkbox"/> Medical Information   |
| <input type="checkbox"/> Gender                    | <input type="checkbox"/> Telephone Number  | <input type="checkbox"/> Military Service      |
| <input checked="" type="checkbox"/> Age            | <input type="checkbox"/> Email Address     | <input type="checkbox"/> Mother's Maiden Name  |
| <input type="checkbox"/> Race/Ethnicity            | <input type="checkbox"/> Education Records | <input type="checkbox"/> Health Plan Numbers   |
| <input type="checkbox"/> Civil or Criminal History | <input type="checkbox"/> Zip Code          |  |
| <input type="checkbox"/> Other:                    |  |  |

### c. Work-Related Data

- |  |  |  |
|--|--|--|
| <input checked="" type="checkbox"/> Occupation   | <input checked="" type="checkbox"/> Telephone Number | <input type="checkbox"/> Salary                  |
| <input checked="" type="checkbox"/> Job Title    | <input type="checkbox"/> Email Address               | <input checked="" type="checkbox"/> Work History |
| <input checked="" type="checkbox"/> Work Address | <input type="checkbox"/> Certificate/License Number  | <input type="checkbox"/> Business Associates     |
| <input type="checkbox"/> PIV Card Information    | <input type="checkbox"/> Fax Number                  |  |
| <input type="checkbox"/> Other:                  |  |  |

### d. Distinguishing Features/Biometrics

- |  |   |  |
|--|---|--|
| <input type="checkbox"/> Fingerprints              | <input type="checkbox"/> Photographs      | <input type="checkbox"/> Genetic Information |
| <input type="checkbox"/> Voice Recording/Signature | <input type="checkbox"/> Video Recordings | <input type="checkbox"/> Voice Signature     |
| <input type="checkbox"/> Other:                    |   |  |

### e. System Administration/Audit Data

- |                                     |  |  |
|-------------------------------------|--|--|
| <input type="checkbox"/> User ID    | <input type="checkbox"/> Date/Time of Access | <input type="checkbox"/> ID Files Accessed |
| <input type="checkbox"/> IP Address | <input type="checkbox"/> Queries Ran         | <input type="checkbox"/> Contents of Files |

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☐ Other:

5. How will the information be used? What is the purpose of the collection? *Describe why this collection of PII is the minimum amount of information necessary to accomplish the purpose of the program, e.g., the SSN is used to verify the identity of an individual.*

The purpose of Form N-1A is to meet the filing and disclosure requirements of the Securities Act and the Investment Company Act and to enable funds to provide investors with information necessary to evaluate an investment in the fund. Unlike many other federal information collections, which are primarily for the use and benefit of the collecting agency, this information collection is primarily for the use and benefit of investors. The information filed with the Commission also permits the verification of compliance with securities law requirements and assures the public availability and dissemination of the information. The records do not include Social Security Numbers.

6. Are individuals provided notice at the time of collection by SEC (*Does the records subject have notice of the collection or is form filled out by third party?*)?

☒ Yes. Please describe how notice is provided.

A System of Records Notice has been published in the Federal Register at 83 FR 6892 and can also be found at <http://www.sec.gov/about/privacy/secprivacyoffice.htm>. See “(SEC-69) SEC’s Division of Investment Management Records.

☐ No

☐ NA. The Information Collection does not collect information about individuals.

## Section 3: How will SEC store the Information Collection responses?

1. How will SEC store the information?

☐ Paper. Please describe.

☒ Electronic. Please describe the IT system that will store the data from the form.  
[www.EDGARfiling.sec.gov](http://www.EDGARfiling.sec.gov)

☒ Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository.  
[www.EDGARfiling.sec.gov](http://www.EDGARfiling.sec.gov)

☐ NA. The SEC does not collect the information. The business entity is required to maintain copies of the information collection. Skip to section 4.

2. If electronic, how does SEC input the responses into the IT system?

☐ Manually (data elements manually entered). Please describe.

☒ Automatically. Please describe.  
Submissions to EDGAR are automatically displayed

3. How would a user search the information submitted on the forms, i.e., how is the information retrieved?

☐ By a unique identifier. Please describe, including any personal identifiers selected in Section 2.4 above, e.g., Personal Name.

☒ By a non-personal identifier. Please describe, e.g., Company Name.  
Company name

4. What is the records retention schedule(s)? Include the records schedule number.

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5. Is any of this information shared outside of the original Division/Office/Program? If yes, describe where (other SEC Divisions or Offices or external entities) and why. What are the authorities of the receiving party?

- ☒ Yes, information is shared with other SEC Divisions or Offices. Please describe.  
The purpose of Form N-1A is to meet the filing and disclosure requirements of the Securities Act and the Investment Company Act and to enable funds to provide investors with information necessary to evaluate an investment in the fund. The information filed with the Commission permits the verification of compliance with securities law requirements and assures the public availability and dissemination of the information. For example, Form N-1A information that is identifiable to any particular fund may be used by the Commission in an enforcement action.
- ☒ Yes, information is shared *external* to SEC with other federal agencies, state/local partners, international partners, or non-governmental entities. Please describe.  
Form N-1A is a public filing, and anyone external to the agency may access it for their own purposes.
- ☐ No. Information on this form is not shared outside of the collecting office.

**Section 4: Individual Completing this Form**

**Name:**      **Amanda Wagner**

**Telephone:**      **(202) 551-6762**

**Date:**      **10/23/2023**

**Email:**      **wagnera@sec.gov**

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**Privacy Office Determination**

(To be completed by Privacy and Information Assurance Branch)

*Check all that apply*

- ☒ **PAW is sufficient.**
- ☒ **Privacy Impact Assessment (PIA) is required. (Select one below)**
- ☐ New PIA is required.
- ☒ System covered by an existing PIA  
PIA Name           EDGAR PIA  
Date of Last Approval.           **3/22/2023**
- ☐ PIA update is required.  
PIA Name  
Date of Last Approval.
- ☐ PIA Appendix update is required.  
PIA Name  
Date of Last Approval
- ☐ PIA in progress
- ☒ **System of Records Notice (SORN) is not required.**
- ☐ **SORN is required.**
- ☐ New SORN is required.
- ☐ SORN update is required.  
Name of SORN:  
Federal Register Number and Date of Publication
- ☐ Covered by published SORN.  
Name of SORN:  
Federal Register Number and Date of Publication
- ☒ **A Privacy Act (e(3)) Statement is not required.**
- ☐ **A Privacy Act (e(3)) Statement is required. (Select on below)**
- ☐ New e(3) statement is required.
- ☐ e(3) statement update is required.
- ☐ Covered by existing e(3) statement.

**Rationale for Privacy Determination**

The information collection collects basic elements of PII including name, job title, and work address that is covered by the EDGAR PIA. No information of a sensitive nature, including social security numbers, will be required under this collection of information. Additionally, the agency has determined that the information collection does not constitute a system of record for purposes of the Privacy Act. Information is not retrieved by a personal identifier.

**Reviewer Information**

**Name:**           Paul Choi

**Date:**           **10/30/2023**