

# **Client Alert**

## Investment Management

## April 14, 2025 EDGAR Next: The Future of SEC Filings Is Here–Are You Ready?

By Scott H. Moss and Angenny M. Rosario

The U.S. Securities and Exchange Commission (SEC) has officially launched EDGAR Next, its latest initiative to upgrade the Electronic Data Gathering, Analysis, and Retrieval (EDGAR) system. This new platform went live on March 24, 2025, and is designed to modernize the filing process, enhance security, and provide improved functionalities for all filers who submit electronic filings to the SEC.<sup>1</sup> All filers must be compliant with EDGAR Next on September 15, 2025, to maintain filing access. Filers applying for EDGAR access after March 24 (New Filers) will automatically be subject to the new system and will not need to enroll separately.<sup>2</sup> However, filers who had EDGAR access prior to the March 24 launch date (Existing Filers) will need to complete the transition steps described below to maintain access. In the interim, Existing Filers who have not yet transitioned can continue to use the previous EDGAR Filing and Online Forms websites without interruption through September 12, 2025.<sup>3</sup>

#### Key Features of EDGAR Next

- Enhanced Security: One of the most notable changes with EDGAR Next is the implementation of individual Login.gov account credentials and multifactor authentication for all users. This replaces the previous system of shared access credentials, such as passwords and passphrases, thereby significantly enhancing the security of filer accounts.
- New User-Friendly Dashboard: EDGAR Next introduces the EDGAR Filer Management Dashboard, a userfriendly dashboard that allows filers to manage their accounts more effectively. Through this dashboard, filers can authorize individuals to manage their accounts, view EDGAR codes, connect EDGAR application programming interfaces (APIs), and submit required annual confirmations.
- **Delegation of Filing Authority:** The new system allows filers to delegate filing authority to third parties, such as law firms, broker-dealers, printers, or other filing agents. This delegation is managed through the dashboard, ensuring that only authorized individuals can make filings on behalf of the filer.
- Ongoing Required Annual Confirmations: To maintain the integrity and accuracy of filer information, EDGAR Next requires filers to confirm annually that all individuals and entities listed on their dashboard are authorized to act on their behalf. This annual confirmation helps ensure that only current and authorized users have access to the filer's account.

#### Steps To Enroll in EDGAR Next for Existing Filers

The enrollment process is designed to be straightforward, ensuring that Existing Filers can transition smoothly to the new system.<sup>4</sup>

- 1. **Create Dashboard Login Credentials:** Each individual who will access EDGAR must create a Login.gov account. This account will be used to log in to the EDGAR Filer Management dashboard.
- 2. **Gather Necessary Information:** Ensure you have the filer's Central Index Key (CIK), current passphrase, and CIK confirmation code (CCC). If these have not been reset since September 2019, they must be updated.

- 3. **Designate Account Administrators:** Each filer must designate at least two account administrators (except for individuals and single-member companies, which may designate one). These administrators will manage the filer's EDGAR account.
- 4. **Enroll via the Dashboard:** Log in to the EDGAR Filer Management website with your Login.gov credentials and follow the enrollment instructions provided on the dashboard.

Please note, for entity filers with more than a single member, it is expected that multiple individuals will obtain EDGAR access on behalf of the entity. This includes both internal members of the entity and individuals working for service providers of the entity, such as law firms and printers, in addition to the two designated account administrators. Additionally, the same organization can have multiple EDGAR codes, for example, for different affiliated issuers, including private funds filing Form D, and multiple management companies.

#### Important Dates and Deadlines

- March 24, 2025: Enrollment opened for EDGAR Next. Filers can begin the enrollment process through the new EDGAR Filer Management dashboard.
- September 12, 2025: The last day to enroll without interruption to filing capabilities. Existing Filers who do not enroll by this date may experience disruptions in their ability to file.
- September 15, 2025: Compliance with EDGAR Next becomes mandatory for all filers. Existing Filers who have not enrolled by this date will be unable to file on EDGAR until they complete the enrollment process.
- December 19, 2025: Final deadline to enroll in EDGAR Next. After this date, Existing Filers that have not yet enrolled will need to submit a Form ID application for access and await SEC staff approval before they can file on EDGAR.

### Contact Us

We understand the complexities of regulatory compliance and are here to assist you with the transition to EDGAR Next. To ensure a seamless transition and avoid any interruptions in your filing capabilities, we encourage you to act promptly. Contact us as soon as possible to get started on the enrollment process. Our team of experts is ready to guide you through each step and ensure that your filings remain compliant with the new SEC requirements.

For more information or assistance with enrolling in EDGAR Next, please reach out to our team at EDGARNext@lowenstein.com. You can also contact your usual Lowenstein Sandler lawyer, who can coordinate with our EDGAR Next team. We are here to help you navigate this transition smoothly and efficiently.

\*Special thanks to paralegal managers Julianne M. Kasprzyk and Keith Sheppard, and paralegal Chase J. Newman, for their contributions to this alert.

<sup>3</sup> Id.

<sup>&</sup>lt;sup>1</sup> https://www.sec.gov/files/rules/final/2024/33-11313.pdf at 1.

<sup>&</sup>lt;sup>2</sup> https://www.sec.gov/newsroom/whats-new/transition-edgar-next-begins-march-24-2025.

<sup>&</sup>lt;sup>4</sup> https://www.sec.gov/submit-filings/filer-support-resources/how-do-i-guides/enroll-edgar-next.

## Contacts

Please contact the listed attorneys for further information on the matters discussed herein.

#### SCOTT H. MOSS

Partner Chair, Fund Regulatory & Compliance Co-chair, Investment Management Group

T: 646.414.6874 smoss@lowenstein.com ANGENNY M. ROSARIO Associate T: 973.422.2960 arosario@lowenstein.com

NEW YORK PALO ALTO NEW JERSEY UTAH WASHINGTON, D.C

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