



Release Date: May 20, 2015

Contact: Herb Perone, 202-507-7215 (office), 301-512-7636 (mobile)

Herb.perone@investmentadviser.org

IAA Statement on SEC Proposals to Update and Modernize Reporting and Disclosure Requirements on Form ADV

Washington, DC, May 20, 2015 – Following is the statement of Karen Barr, President and CEO of the Investment Adviser Association (IAA), on today’s SEC proposal to update and modernize Form ADV:

“The IAA applauds the SEC for continuing to assess what data it needs – and in what format – to provide the best possible regulatory oversight for investment advisers and to enhance the effectiveness and efficiency of its adviser exams. As the primary regulator of advisers, the SEC is in the best position to monitor and evaluate risks in the investment management industry and should have appropriate data to conduct those analyses. Perhaps more importantly, the millions of investors who rely on investment advisers to help them save and invest deserve the best possible data to assess those services. It is important that the SEC continue to review and update Form ADV as the markets, the advisory industry, and firms’ business activities continue to evolve and change.

“We appreciate that the proposal would tier reporting requirements based on firm size. Most investment advisers have more than \$150 million in separately managed account assets, necessitating responses to additional questions. About 535 advisers have more than \$10 billion in RAUM, triggering further data reporting.

“As we prepare our comments, the IAA will be paying special attention to the proposed amendments to Form ADV and the new information required about separately managed accounts (SMAs), including the tiering method, the proposal’s focus on derivatives and borrowings, and the details of the record-keeping changes.”

###

The Investment Adviser Association (IAA) is the leading trade association representing the interests of SEC-registered investment adviser firms. The IAA’s more than 550 member firms collectively manage assets in excess of \$16 trillion for a wide variety of institutional and individual investors. For more information, visit www.investmentadviser.org or follow us on [Twitter](#) and [LinkedIn](#).