2024 Effective Date Reminder

This Effective Date Reminder lists only those pronouncements issued as of November 1, 2024, which became effective on or after January 1, 2024 for most entities or have not yet become effective for all entities as of November 1, 2024.

FINANCIAL ACCOUNTING STANDARDS BOARD (FASB)

ASU 2018-12, *Financial Services—Insurance (Topic 944): Targeted Improvements to the Accounting for Long-Duration Contracts*

This ASU addresses the accounting for long-duration insurance contracts, such as life insurance, disability income, long-term care and annuities. As amended by ASU 2020-11, for public business entities that meet the definition of an SEC filer, except for entities eligible to be smaller reporting companies (as defined by the SEC), ASU 2018-12 was effective for fiscal years beginning after December 15, 2022, and interim periods within those fiscal years. The one-time determination of whether an entity is a smaller reporting company should be based on an entity's most recent determination as of November 15, 2019, in accordance with SEC regulations. For all other entities, the ASU is effective for fiscal years beginning after December 15, 2024, and interim periods within fiscal years beginning after December 15, 2025.

ASU 2022-05, *Financial Services – Insurance (Topic 944): Transition for Sold Contracts*

This ASU allows an insurance entity to make an accounting policy election, on a transaction-by-transaction basis, to exclude certain contracts or legal entities from applying the guidance in ASU 2018-12, provided certain conditions are met. For public business entities that meet the definition of an SEC filer, except for entities eligible to be smaller reporting companies (as defined by the SEC), ASU 2022-05 was effective for fiscal years beginning after December 15, 2022, and interim periods within those fiscal years. For all other entities, the ASU is effective for fiscal years beginning after December 15, 2024, and interim periods within fiscal years beginning after December 15, 2025.

ASU 2020-06, *Debt-Debt with Conversion and Other Options (Subtopic 470-20) and Derivatives and Hedging-Contracts in Entity's Own Equity (Subtopic 815-40): Accounting for Convertible Instruments and Contracts in an Entity's Own Equity*

Among other provisions, the amendments in this ASU significantly change the guidance on the issuer's accounting for convertible instruments and the guidance on the derivative scope exception for contracts in an entity's own equity such that fewer conversion features will require separate recognition, and fewer freestanding instruments, like warrants, will require liability treatment. The ASU was effective for public business entities that meet the definition of an SEC filer, excluding entities eligible to be smaller reporting companies as defined by the SEC, for fiscal years beginning after December 15, 2021, including interim periods within those fiscal years. For all other entities, the ASU was effective for fiscal years beginning after December 15, 2023, including interim periods within those fiscal years.

ASU 2021-08, *Business Combinations (Topic 805): Accounting for Contract Assets and Contract Liabilities from Contracts with Customers*

This ASU requires an acquirer to recognize and measure contract assets acquired and contract liabilities assumed in a business combination in accordance with ASC 606, *Revenue from Contracts with Customers*. For public business entities, the ASU was effective for fiscal years beginning after December 15, 2022, including interim periods within those fiscal years. For all other entities, the ASU was effective for fiscal years beginning after December 15, 2023, including interim periods within those fiscal years

ASU 2022-01, *Derivatives and Hedging (Topic 815): Fair Value Hedging – Portfolio Layer Method*

This ASU allows multiple hedged layers to be designated for a single closed portfolio of financial assets or one or more beneficial interests secured by a portfolio of financial instruments. For public business entities, the ASU was effective for fiscal years beginning after December 15, 2022, and interim periods within those fiscal years. For all other entities, the ASU was effective for fiscal years beginning after December 15, 2023, and interim periods within those fiscal years.

ASU 2022-03, *Fair Value Measurement (Topic 820): Fair Value Measurement of Equity Securities Subject to Contractual Sale Restrictions*

This ASU clarifies the guidance when measuring the fair value of an equity security subject to contractual restrictions that prohibit the sale of the security; however, the broad principles of fair value measurement have not been changed. For public business entities, the amendments in ASU 2022-03 were effective for fiscal years beginning after December 15, 2023, and interim periods within those fiscal years. For all other entities, the ASU is effective for fiscal years beginning after December 15, 2024, and interim periods within those fiscal years.

ASU 2022-04, *Liabilities – Supplier Finance Programs (Subtopic 405-50): Disclosure of Supplier Finance Program Obligations*

This ASU introduces new disclosure requirements for a buyer in a supplier finance program that are intended to provide users of the financial statements with sufficient information to understand the program’s nature, activity during the period, changes from period to period, and potential magnitude. ASU 2022-04 was effective for fiscal years beginning after December 15, 2022, including interim periods within those fiscal years, except for the amendment on roll forward information, which was effective for fiscal years beginning after December 15, 2023 (i.e., information is to be retrospectively disclosed for each period for which a balance sheet is presented, except for the roll forward information which is applied prospectively).

ASU 2023-01, *Leases (Topic 842): Common Control Arrangements*

This ASU addresses the terms and conditions to be considered when classifying and accounting for leases between entities under common control, and the accounting for leasehold improvements in leases between entities under common control. The amendments in ASU 2023-01 were effective for fiscal years beginning after December 15, 2023, including interim periods within those fiscal years.

ASU 2023-02, *Investments—Equity Method and Joint Ventures (Topic 323): Accounting for Investments in Tax Credit Structures Using the Proportional Amortization Method (a consensus of the Emerging Issues Task Force)*

The amendments in this ASU permit reporting entities to elect to account for their tax equity investments regardless of the tax credit program from which the income tax credits are received, using the proportional amortization method if certain conditions are met. For public business entities, the ASU was effective for fiscal years beginning after December 15, 2023, including interim periods within those fiscal years. For all other entities, the ASU is effective for fiscal years beginning after December 15, 2024, including interim periods within those fiscal years.

ASU 2023-05, *Business Combinations—Joint Venture Formations (Subtopic 805-60): Recognition and Initial Measurement*

The amendments in this ASU require that a joint venture, upon formation, apply a new basis of accounting. The amendments are effective prospectively for all joint venture formations with a formation date on or after January 1, 2025.

ASU 2023-07, *Segment Reporting (Topic 280): Improvements to Reportable Segment Disclosures*

This ASU expands the disclosures about a public entity's reportable segments and requires additional information about a segment's expenses. ASU 2023-07 is effective for fiscal years beginning after December 15, 2023 and interim periods within fiscal years beginning after December 15, 2024.

ASU 2023-08, *Intangibles—Goodwill and Other—Crypto Assets (Subtopic 350-60): Accounting for and Disclosure of Crypto Assets*

This ASU addresses feedback from stakeholders who indicated that the FASB should give priority to improving the accounting for and disclosure of crypto assets. The aim of the ASU is to provide investors with information that better reflects the economic effect of certain crypto assets and an entity's financial position. The ASU is effective for all entities for fiscal years beginning after December 15, 2024, including interim periods within those fiscal years.

ASU 2023-09, *Income Taxes (Topic 740): Improvements to Income Tax Disclosures*

This ASU requires enhanced disclosures about a reporting entity's effective tax rate and its income taxes paid (refunded). ASU 2023-09 is effective for public business entities for annual periods beginning after December 15, 2024 and for annual periods beginning after December 15, 2025, for all other entities.

ASU 2024-01, *Compensation—Stock Compensation (Topic 718): Scope Application of Profits Interest and Similar Awards*

This ASU was issued to provide guidance on how entities should determine the appropriate guidance to apply when accounting for the issuance of profits interest units and similar types of awards. The ASU is effective for public business entities for interim and annual periods for fiscal years beginning after December 15, 2024. For all other entities, the guidance is effective for fiscal years beginning after December 15, 2025, and the interim periods therein.

ASU 2024-02, *Codification Improvements—Amendments to Remove References to the Concept Statements*

ASU 2024-02 removes various references to the FASB’s Concepts Statements from the FASB’s Accounting Standards Codification (Codification or GAAP). The Concepts Statements are non-authoritative guidance issued by the FASB that provide the objectives, qualitative characteristics and other concepts that govern the development of accounting principles by the FASB. The amendments in ASU 2024-02 are effective for public business entities for fiscal years beginning after December 15, 2024. For all other entities, the amendments are effective for fiscal years beginning after December 15, 2025.

PUBLIC COMPANY ACCOUNTING OVERSIGHT BOARD

PCAOB Release No. 2022-002, *Planning and Supervision of Audits Involving Other Auditors and Dividing Responsibility for the Audit with Another Accounting Firm*

The PCAOB has strengthened the requirements for planning and supervising audits involving other accounting firms or individual accountants outside the accounting firm that issues the audit report. The amendments are effective for audits of financial statements for fiscal years ending on or after December 15, 2024.

PCAOB Release No. 2023-008, *The Auditor's Use of Confirmation, and Other Amendments to PCAOB Standards*

The PCAOB is replacing its auditing standard related to an auditor's use of confirmation, AS 2310, The Confirmation Process, with a new standard, AS 2310, The Auditor's Use of Confirmation, and making conforming amendments to certain related PCAOB auditing standards. The new standard is designed to improve the quality of audits when confirmation is used by the auditor and to reflect changes in the means of communication and in business practice since the standard was originally issued. The new standard and related amendments are effective for audits of financial statements for fiscal years ending on or after June 15, 2025.

PCAOB Release No. 2024-004, *General Responsibilities of the Auditor in Conducting an Audit and Amendments to PCAOB Standards*

The PCAOB is adopting a new auditing standard, AS 1000, General Responsibilities of the Auditor in Conducting an Audit, and rescinding and amending other related PCAOB standards. The new auditing standard addresses the general responsibilities of the auditor, such as due professional care and professional skepticism, when conducting an audit in accordance with the standards of the PCAOB. The amendments include accelerating the documentation completion date from 45 days to 14 days. The new standard and related amendments are effective for audits of financial statements for fiscal years beginning on or after December 15, 2024, except that, for registered public accounting firms that provide audit opinions for 100 or fewer issuers, the amendment relating to the documentation completion date will take effect for audits of financial statements for fiscal years beginning on or after December 15, 2025.

PCAOB Release No. 2024-007, *Amendments Related to Aspects of Designing and Performing Audit Procedures that Involve Technology-Assisted Analysis of Information in Electronic Form*

The PCAOB is adopting amendments to AS 1105, Audit Evidence, and AS 2301, The Auditor's Responses to the Risks of Material Misstatement, and adopting conforming amendments to another auditing standard. The amendments are designed to improve audit quality and enhance investor protection by addressing aspects of designing and performing audit procedures that involve technology-assisted analysis of information in electronic form. The amendments are effective for audits of financial statements for fiscal years beginning on or after December 15, 2025.

PCAOB Release No. 2024-005, *A Firm's System of Quality Control and Other Amendments to PCAOB Standards, Rules, and Forms*

The PCAOB is adopting a new quality control standard, together with other amendments to PCAOB standards, rules, and forms. These would:

1. supersede current PCAOB quality control standards with an integrated, risk-based standard, QC 1000, A Firm's System of Quality Control, that would apply to all registered public accounting firms;
2. create reporting requirements on quality control matters and a new, non-public reporting form, Form QC;
3. expand the auditor's responsibility to monitor for and respond to deficiencies on completed engagements under an amended and retitled AS 2901, Responding to Engagement Deficiencies After Issuance of the Auditor's Report, and related amendments to our attestation standards for broker-dealer engagements;
4. supersede the existing standard ET 102, Integrity and Objectivity, with a new standard, EI 1000, Integrity and Objectivity, to better align our ethics requirements with the scope, approach, and terminology of QC 1000; and
5. make additional changes to PCAOB standards, rules, and forms.

The standard and related amendments were approved by the SEC on September 9, 2024, and will take effect on December 15, 2025. The first evaluation period will be for the period beginning on the effective date of the standard (i.e., December 15, 2025) and ending on September 30, 2026. The firm's first evaluation must be reported to the PCAOB on Form QC no later than November 30, 2026.

PCAOB Release No. 2024-008, *Amendment to PCAOB Rule 3502 Governing Contributory Liability*

The PCAOB is amending PCAOB Rule 3502, Responsibility Not to Knowingly or Recklessly Contribute to Violations, the Board's rule governing the liability of associated persons who contribute to a registered public accounting firm's primary violation. Specifically, the Board is changing from recklessness to negligence the standard of conduct for associated persons' contributory liability.

AMERICAN INSTITUTE OF CERTIFIED PUBLIC ACCOUNTANTS (AICPA)

SAS 146, *Quality Management for an Engagement Conducted in Accordance With Generally Accepted Auditing Standards*

SAS 146 addresses the specific responsibilities of the auditor regarding quality management at the engagement level for an audit of financial statements and the related responsibilities of the engagement partner. SAS 146 is effective for engagements conducted in accordance with GAAS for the periods beginning on or after December 15, 2025. RSM US early adopted SAS 146 for audits of financial statements for periods beginning on or after December 15, 2022, consistent with the effective date of ISA 220 (Revised), Quality Management for an Audit of Financial Statements.

SAS 149, *Special Considerations — Audits of Group Financial Statements (Including the Work of Component Auditors and Audits of Referred-to Auditors)*

SAS 149 addresses special considerations that apply to a group audit, including in circumstances in which component auditors are involved or when the group auditor makes reference to the audit of a referred-to auditor. SAS 149 is effective for audits of group financial statements for periods ending on or after December 15, 2026. RSM US is early adopting SAS 149 for audits of group financial statements for periods ending on or after December 15, 2024, consistent with annual periods beginning on or after December 15, 2023, for ISA 600 (Revised), Special Considerations--Audits of Group Financial Statements (Including the Work of Component Auditors). RSM's state and local government industry is early adopting SAS 149 for audits of group financial statements for periods beginning on or after June 25, 2023.

SQMS 1, *A Firm's System of Quality Management*

SQMS 1 addresses a firm's responsibilities to design, implement, and operate a system of quality management for its accounting and auditing practice. Systems of quality management in compliance with SQMS 1 are required to be designed and implemented by December 15, 2025, and the evaluation of the system of quality management required by paragraphs 54–55 is required to be performed within one year following December 15, 2025. RSM US early adopted SQMS 1 for December 15, 2022, rather than December 15, 2025, consistent with ISQM 1, Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements.

SQMS 2, *Engagement Quality Reviews*

SQMS 2 addresses the following:

a. The appointment and eligibility of the engagement quality reviewer
b. The engagement quality reviewer's responsibilities relating to the performance and documentation of an engagement quality review

SQMS 2 is effective for:

a. audits or reviews of financial statements for periods beginning on or after December 15, 2025, and
b. other engagements in the firm's accounting and auditing practice beginning on or after December 15, 2025.

RSM US early adopted SQMS 2 for December 15, 2022, rather than December 15, 2025, consistent with ISQM 2, Engagement Quality Reviews.

SQMS 3, *Amendments to QM Sections 10, A Firm's System of Quality Management, and 20, Engagement Quality Reviews*

The amendments to QM sections 10 and 20 in SQMS 3 conform certain terms to language used in SAS No. 149 and provide guidance on differentiating between a resource and an information source. The amendment to QM section 10 is effective concurrently with a firm's implementation of SQMS Nos. 1 and 2 on December 15, 2025. The amendment to QM section 20 is effective for (a) audits or reviews of financial statements for periods beginning on or after December 15, 2025, and (b) other engagements in the firm's accounting and auditing practice beginning on or after December 15, 2025. RSM US early adopted the amendments to QM section 10 in SQMS 3 upon issuance (March 6, 2023) consistent with the firm's adoption of SQMS 1. RSM US early adopted the amendments to QM section 20 for (a) audits or reviews of financial statements for periods beginning on or after December 15, 2022, and (b) other engagements in the firm's accounting and auditing practice beginning upon issuance of SQMS 3 (March 6, 2023) consistent with the firm's adoption of SQMS 2.

SSAE No. 23, *Amendments to the Attestation Standards for Consistency With the Issuance of AICPA Standards on Quality Management*

SSAE No. 23 aligns certain concepts in the attestation standards related to quality management, where appropriate, with:

- Statement on Quality Management Standards (SQMS) No. 1, A Firm's System of Quality Management
- SQMS No. 2, Engagement Quality Reviews
- Statement on Auditing Standards No. 146, Quality Management for an Engagement Conducted in Accordance With Generally Accepted Auditing Standards, and
- Statement on Accounting and Review Services No. 26, Quality Management for an Engagement Performed in Accordance With Statements on Standards for Accounting and Review Services.

The most significant change in SSAE No. 23 is the deletion of the term "other practitioner" and the introduction of two new terms, "participating practitioner" and "referred-to practitioner." The performance and reporting requirements were also revised to differentiate between these types of other practitioners.

SSAE No. 23 is effective for engagements performed in accordance with the attestation standards beginning on or after December 31, 2025. RSM US early adopted SSAE 23 for attestation reports issued on or after August 28, 2024, except for those engagements that are substantially complete as of that date.

SSARS 26, *Quality Management for an Engagement Conducted in Accordance With Statements on Standards for Accounting and Review Services*

SSARS 26 enhances certain concepts related to quality management for engagements performed in accordance with SSARSs. SSARS 26 is effective for engagements performed in accordance with SSARSs for periods ending on or after December 15, 2025. RSM US early adopted SSARS 26 for reviews of financial statements for periods beginning on or after December 15, 2022, consistent with SQMS 2.

GOVERNMENTAL ACCOUNTING STANDARDS BOARD (GASB)

GASB Statement 100, *Accounting Changes and Error Corrections–an amendment of GASB Statement No. 62*

Statement 100 enhances the accounting and financial reporting requirements for accounting changes and error corrections. The standard is effective for fiscal years beginning after June 15, 2023, and all reporting periods thereafter.

GASB Statement 101, *Compensated Absences*

Statement 101 updates the recognition and measurement guidance for compensated absences through aligning the recognition and measurement guidance under a unified model and by amending certain previously required disclosures. The standard is effective for fiscal years beginning after December 15, 2023, and all reporting periods thereafter.

GASB Statement 99, *Omnibus 2022*

Statement 99 addresses various accounting and financial reporting issues, including classification and reporting of derivative instruments; clarification of provisions in GASB Statement 34, GASB Statement 87, as amended, GASB Statement 94, and GASB Statement 96; period for which LIBOR is an appropriate benchmark interest rate; accounting for SNAP distributions; nonmonetary transaction disclosures; pledged revenue transactions; and terminology updates to GASB Statement 53 and GASB Statement 63. The requirements of this Statement are effective as follows:

- The requirements related to extension of the use of LIBOR, accounting for SNAP distributions, disclosures of nonmonetary transactions, pledges of future revenues by pledging governments, clarification of certain provisions in Statement 34, as amended, and terminology updates related to Statement 53 and Statement 63 are effective upon issuance.
- The requirements related to leases, PPPs, and SBITAs are effective for fiscal years beginning after June 15, 2022, and all reporting periods thereafter.
- The requirements related to financial guarantees and the classification and reporting of derivative instruments within the scope of Statement 53 are effective for fiscal years beginning after June 15, 2023, and all reporting periods thereafter

Implementation Guide No. 2021-1, *Implementation Guidance Update - 2021*

This implementation guidance includes new questions and answers relating to accounting and financial reporting for derivative instruments, fiduciary activities, leases, accounting and financial reporting for nonexchange transactions, and amendments to previously issued questions and answers. The requirements of this Implementation Guide are effective as follows:

a. Questions 4.1–4.3, 4.23, and 5.2–5.4 and the supersession of Questions Z.51.4–Z.51.7 in Implementation Guide 2015-1 for reporting periods beginning after June 15, 2022
b. Questions 4.4–4.21 for fiscal years beginning after June 15, 2022, and all reporting periods thereafter
c. Question 4.22 for fiscal years beginning after June 15, 2021
d. Question 5.1 for reporting periods beginning after June 15, 2023

Implementation Guide No. 2023-1, *Implementation Guidance Update—2023*

This implementation guidance includes new questions and answers relating to accounting and financial reporting for leases, accounting and financial reporting for subscription based information technology arrangements, accounting and financial reporting accounting changes and error corrections and amendments to previously issued questions and answers. The requirements of this Implementation Guide are effective as follows:

a. Questions 4.1–4.9 and 5.1 for fiscal years beginning after June 15, 2023, and all reporting periods thereafter
b. Questions 4.10 for fiscal years beginning after June 15, 2023, and all reporting periods thereafter

GASB Statement 102, *Certain Risk Disclosures*

Statement 102 provides users of government financial statements with essential information about risks related to a government's vulnerabilities due to certain concentrations or constraints. The standard is effective for fiscal years beginning after June 15, 2024, and all reporting periods thereafter.

GASB Statement 103, *Financial Reporting Model Improvements*

Statement 103 improves key components of the financial reporting model to enhance effectiveness in providing information that is essential for decision making and assessing a government's accountability. Certain application issues are also addressed by this statement. The standard is effective for fiscal years beginning after June 15, 2025, and all reporting periods thereafter.

GASB Statement 104, *Disclosure of Certain Capital Assets*

Statement 104 provides users of government financial statements with essential information about certain types of capital assets by requiring certain types of capital assets to be disclosed separately in the capital assets note disclosures required by Statement 34. This standard is effective for fiscal years beginning after June 15, 2025, and all reporting periods thereafter.

INTERNATIONAL ACCOUNTING STANDARDS BOARD (IASB)

IAS 1, *Presentation of Financial Statements*

Amendments regarding (a) disclosure of material accounting policy information, rather than significant accounting policies, and (b) the classification of liabilities as current or non-current are effective for annual periods beginning on or after January 1, 2023. Amendments to IAS 1 to clarify that only covenants with which an entity must comply on or before the reporting date affects the classification of a liability as current or non-current, and to disclose information that enables users of the financial statements to understand the risk that non-current liabilities with covenants could become repayable within twelve months. The amendments are effective or periods beginning on or after January 1, 2024.

IAS 8, *Accounting Policies, Changes in Accounting Estimates and Errors*

Amendments to introduce a definition of “accounting estimates” and to clarify how companies should distinguish changes in accounting policies from changes in accounting estimates are effective for annual reporting periods beginning on or after January 1, 2023.

Revised IAS 28, *Investments in Associates and Joint Ventures*

Amendments addressing an inconsistency between the requirements in International Financial Reporting Standard (IFRS) 10 and those in IAS 28 in dealing with the sale or contribution of assets between an investor and its associate or joint venture will be effective on a date to be determined by the IASB.

Revised IFRS 10, *Consolidated Financial Statements*

Amendments addressing an inconsistency between the requirements in IFRS 10 and those in IAS 28 in dealing with the sale or contribution of assets between an investor and its associate or joint venture will be effective on a date to be determined by the IASB.

Revised IFRS 16, *Leases*

Amendments to IFRS 16 clarify how a seller-lessee subsequently measures sales and leaseback transactions that satisfy the requirements I IFRS 15 to be accounted for as a sale. The amendments are effective for annual periods beginning on or after January 1, 2024.

INTERNATIONAL AUDITING AND ASSURANCE STANDARDS BOARD (IAASB)

ISA 600 (Revised), *Special Considerations--Audits of Group Financial Statements (Including the Work of Component Auditors)*

ISA 600 (Revised) addresses special considerations that apply to a group audit, including when component auditors are involved. ISA 600 (Revised) is effective for audits of group financial statements for periods beginning on or after December 15, 2023.

Narrow Scope Amendments to ISA 700 (Revised), *Forming an Opinion and Reporting on Financial Statements, and ISA 260 (Revised), Communication with Those Charged With Governance, as a Result of the Revisions to the IESBA Code that Require a Firm to Publicly Disclose When a Firm Has Applied the Independence Requirements for Public Interest Entities (PIEs)*

These narrow scope amendments to two IAASB standards operationalize changes to the International Ethics Standards Board for Accountants' (IESBA) International Code of Ethics for Professional Accountants (including International Independence Standards) related to listed and public interest entities. These narrow scope amendments are effective for audits of financial statements for periods beginning on or after December 15, 2024.

The ISA for LCE and Conforming Amendments to Other International Standards Arising from the ISA for LCE

The International Standard on Auditing for Audits of Financial Statements of Less Complex Entities (The ISA for LCE) is a standalone global auditing standard designed specifically for smaller and less complex businesses and organizations. Built on the foundation of the International Standards on Auditing, audits performed using this standard provide the same level of assurance for eligible audits: reasonable assurance. The standard is effective for audits beginning on or after December 15, 2025 for jurisdictions that adopt or permit its use.

U.S. SECURITIES AND EXCHANGE COMMISSION (SEC)

Release No. 33-11238

The SEC is amending the rule under the Investment Company Act of 1940 that addresses certain broad categories of investment company names that are likely to mislead investors about an investment company's investments and risks. The amendments to this rule are designed to increase investor protection by improving, and broadening the scope of, the requirement for certain funds to adopt a policy to invest at least 80 percent of the value of their assets in accordance with the investment focus that the fund's name suggests, updating the rule's notice requirements, and establishing recordkeeping requirements. The Commission is also adopting enhanced prospectus disclosure requirements for terminology used in fund names, and additional requirements for funds to report information on Form N-PORT regarding compliance with the names-related regulatory requirements.

Release No. 33-11211

The SEC is adopting amendments to certain rules that govern money market funds under the Investment Company Act of 1940. These amendments are designed to improve the resilience and transparency of money market funds. The amendments will revise the primary rule that governs money market funds to remove the ability for a fund board to temporarily suspend redemptions if the fund's liquidity falls below a threshold. In addition, the amendments will remove the tie between liquidity thresholds and the potential imposition of liquidity fees. The amendments will also require certain money market funds to implement a liquidity fee framework that will better allocate the costs of providing liquidity to redeeming investors. In addition, the Commission is increasing the daily liquid asset and weekly liquid asset minimum requirements to 25% and 50%, respectively. The Commission also is amending certain reporting requirements on Form N-MFP and Form N-CR and making certain conforming changes to Form N-1A to reflect amendments to the regulatory framework for money market funds. In addition, the Commission is addressing how money market funds with stable net asset values may handle a negative interest rate environment, including by adopting amendments that will permit these funds to use share cancellation, subject to certain conditions. Further, the Commission is adopting rule amendments to specify how funds must calculate weighted average maturity and weighted average life. In addition, the Commission is adopting amendments to Form PF concerning the information large liquidity fund advisers must report for the liquidity funds they advise. Finally, the Commission is adopting two technical amendments to Form N-CSR and Form N-1A to correct errors from recent Commission rulemakings.

Release No. 34-97424 *Final Rule, Share Repurchase Disclosure Modernization*

Amendments to modernize the disclosure requirements relating to repurchases of an issuer's equity securities, including requiring issuers to provide daily repurchase activity on a quarterly or semi-annual basis, depending on the type of issuer. The amendments will improve disclosure and provide investors with enhanced information to assess the purposes and effects of share repurchases.

The amendments will require issuers to disclose daily quantitative share repurchase information either quarterly or semi-annually. The required disclosures include, for each day on which a repurchase was conducted, the number of shares repurchased that day and the average price paid, among other things. Issuers will also be required to include a checkbox indicating whether certain officers and directors traded in the relevant securities in the four business days before or after the announcement of the repurchase plan or program.

Further, the amendments will revise and expand narrative repurchase disclosure requirements to require that an issuer disclose: (1) the objectives or rationales for its share repurchases and the process or criteria used to determine the amount of repurchases; and (2) any policies and procedures relating to purchases and sales of the issuer's securities during a repurchase program by its officers and directors, including any restriction on such transactions.

Finally, the amendments will add a new item to Regulation S-K to better allow investors, the Commission, and other market participants to observe how issuers use Rule 10b5-1 plans. New Item 408(d) will require quarterly disclosure in periodic reports on Forms 10-Q and 10-K about an issuer's adoption and termination of Rule 10b5-1 trading arrangements.

Release No. 33-11275, 34-99678 *Final Rule: The Enhancement and Standardization of Climate-Related Disclosures for Investors*

Final SEC rules related to providing certain climate-related information in registrants' registration statements and annual reports. The rules as adopted are currently on "stay" pending judicial review.

Release No. IC-35308, *Final Rule: Form N-PORT and Form N-CEN Reporting; Guidance on Open-End Fund Liquidity Risk*

Amendments to reporting requirements on Forms N-PORT and N-CEN that apply to certain registered investment companies, including registered open-end funds, registered closed-end funds, and unit investment trusts. The amendments will require more frequent reporting of monthly portfolio holdings and related information to the Commission and the public, amend certain reporting requirements relating to entity identifiers, and require open-end funds to report information about service providers used to comply with liquidity risk management program requirements. in addition, the Commission provided guidance related to open-end fund liquidity risk management program requirements.

Final Rule: Private Fund Advisers; Documentation of Registered Investment Adviser Compliance

Final rules designed to protect investors who directly or indirectly invest in private funds by increasing visibility into certain practices involving compensation schemes, sales practices, and conflicts of interest through disclosure; establishing requirements to address such practices that have the potential to lead to investor harm; and restricting practices that are contrary to the public interest and the protection of investors.

Provisions are effective 12 and 18-months from the rule being published in the Federal Register (9/14/2023)

Final Rule: Investment Company Names

The purpose of the Names Rule is to prevent fund names from misrepresenting the fund's investments and risks. Typically, a fund's name is the first piece of information that investors receive about a fund and fund names offer important signaling for investors in assessing their investment options. However, because of developments in the fund industry since the adoption of the Names Rule in 2001 – including the increase in fund assets under management and the proliferation of diverse fund strategies, such as those with thematic and environmental, social, or governance ("ESG")-related objectives – the Commission is modernizing and enhancing the Names Rule and other names-related regulatory requirements to further its investor protections goals.

Provisions are effective 60 days from the rule being published in the Federal Register.

Final Rule: Tailored Shareholder Reports for Mutual Funds and Exchange-Traded Funds; Fee Information in Investment Company Advertisements

The final rule is designed to enhance the information mutual funds, exchange-traded funds ("ETFs"), and certain other funds currently report about their proxy votes and to make that information easier to analyze. The Commission also adopted rule and form amendments under the Securities Exchange Act of 1934 ("Exchange Act") that would require an institutional investment manager subject to the Exchange Act to report on Form N-PX how it voted proxies relating to executive compensation matters, as required by the Exchange Act. The reporting requirements for institutional investment managers complete implementation of those requirements added by the Dodd-Frank Wall Street Reform and Consumer Protection Act ("Dodd-Frank Act")

Final Rule: Form PF; Reporting Requirements for All Filers and Large Hedge Fund Advisers

The final rule relates to amendments to Form PF, the confidential reporting form for certain SEC-registered investment advisers to private funds, including those that also are registered with the CFTC as a commodity pool operator ("CPO") or commodity trading adviser ("CTA"). The amendments are designed to enhance the Financial Stability Oversight Council's ("FSOC's") ability to monitor systemic risk as well as bolster the SEC's regulatory oversight of private fund advisers and investor protection efforts. In connection with the amendments to Form PF, the SEC is amending a rule under the Investment Advisers Act of 1940 ("Advisers Act") to revise instructions for requesting a temporary hardship exemption.

Release No. 33-11265, *Final Rules: SPACs, Shell Companies, and Projections*

The Securities and Exchange Commission adopted final rules to enhance disclosures and provide additional investor protections in initial public offerings (IPOs) by special purpose acquisition companies (SPACs) and in subsequent business combination transactions between SPACs and target companies (de-SPAC transactions). The final rules, among other things:

- Require additional disclosures about SPAC sponsor compensation, conflicts of interest, dilution, the target company, and other information that is important to investors in SPAC IPOs and de-SPAC transactions;
- Require, in certain situations, the target company in a de-SPAC transaction to be a coregistrant with the SPAC (or another shell company) and thus assume responsibility for the disclosures in the registration statement filed in connection with the de-SPAC transaction;
- Deem any business combination transaction involving a reporting shell company, including a SPAC, to be a sale of securities to the reporting shell company's shareholders; and
- Better align the regulatory treatment of projections in de-SPAC transactions with that in traditional IPOs under the Private Securities Litigation Reform Act of 1995 (PSLRA)

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