Information on Amendments to Municipal Advisor Forms Relating to Personally Identifiable Information (PII)

Effective May 14, 2018, the Securities and Exchange Commission has amended Form MA and Form MA-I to eliminate portions of the forms that request filers to provide certain PII, including Social Security numbers, dates of birth, or Foreign ID numbers. Click here for the Adopting Release.

These amendments are not yet reflected in Form MA and Form MA-I on EDGAR. As a result, when completing Form MA, MA/A, MA-A, or Form MA-I or MA-I/A, you will see sections that ask for PII. The filer should not provide this information. It is the filer’s responsibility to ensure that no PII is submitted in Form MA, MA/A, MA-A and Form MA-I and MA-I/A.

The following instructions provide guidance on the steps filers must take to avoid submitting PII in a Form MA, MA/A, MA-A or a Form MA-I or MA-I/A filing. Filers should review the instructions corresponding to the form sought to be filed:

Initial Form MA:

Item 1C(2): If the filer does not have an employer identification number, the form directs the filer to provide his/her Social Security number in this item. The filer should not provide his/her Social Security number. Instead, the filer should input a Social Security number consisting of all zeros: “000-00-0000”.

Schedule A-2 and Schedule B-2: If the filer discloses any individuals in Schedule A-2 or B-2, the form directs the filer to identify any such individual by providing the individual’s CRD number, or, if none, a combination of the individual’s Social Security number, date of birth, or Foreign ID number. The filer should not provide the individual’s Social Security number, date of birth, or Foreign ID number. Instead, if the individual does not have a CRD number, the filer should input a CRD number consisting of seven zeros: “0000000”.

Annual Updates (Form MA-A) and Amendments (Form MA/A):

Item 1C(2): If the filer does not have an employer identification number, the form directs the filer to provide his/her Social Security number in this item. The filer should not provide his/her Social Security number. The filer should review this section to ensure that no Social Security number was disclosed in a prior filing. If a Social Security number is disclosed in this item, the filer should replace it with a Social Security number consisting of all zeros: “000-00-0000”.

For new entries to Schedule A-2 and Schedule B-2: If the filer discloses any new individuals in Schedule A-2 or B-2, the form directs the filer to identify any such individual by providing the individual’s CRD number, or, if none, a combination of the individual’s Social Security number, date of birth, or Foreign ID number. The filer should not provide the individual’s Social Security number, date of birth, or Foreign ID number. Instead, if the individual does not have a CRD number, the filer should input a CRD number consisting of seven zeros: “0000000”.

For all existing entries in Schedule A-2 and Schedule B-2: If the filer has already-existing entries in Schedule A-2 or Schedule B-2 that disclose an individual’s Social Security number, date of birth, or Foreign ID number, the filer should remove this
To do so, amend each entry (in Schedule C) that contains this information, delete the Social Security number, date of birth, and/or Foreign ID number, and either input the individual’s CRD number or, if the individual does not have one, a CRD number consisting of seven zeros: “0000000”.

**Initial Form MA-I:**

**Item 1A:** The form directs the filer to provide the Social Security number of the individual for whom the MA-I is being filed. The filer should not provide this information and **should instead input a Social Security number consisting of all zeros**: “000-00-0000”.

**Amendment to Form MA-I:**

**Item 1A:** The form directs the filer to provide the Social Security number of the individual for whom the MA-I is being filed. The filer should not provide this information. The filer should review this section and, if a Social Security number was previously disclosed in this item, **the filer should replace it with a Social Security number consisting of all zeros**: “000-00-0000”.

Questions about these instructions should be directed to the Office of Municipal Securities at 202-551-5680.