

**U.S. Securities and Exchange Commission**  
**Agency RIF and Reorganization Plan**  
**March 13, 2025**

**Introduction**

In accordance with Executive Order 14210, dated February 11, 2025, titled *Implementing the President's "Department of Government Efficiency" Workforce Optimization Initiative* and the February 26, 2025 Memorandum from the Office of Management and Budget (OMB) and Office of Personnel Management (OPM) titled *Guidance on Agency RIF and Reorganization Plans Requested by Implementing The President's "Department of Government Efficiency" Workforce Optimization Initiative*, this report constitutes the U.S. Securities and Exchange Commission's (SEC) Agency RIF and Reorganization Plan (ARRP).

Below are the SEC's plans and responses with respect to each of the required elements of the ARRP. Please note the ideas below are set forth by Acting Chairman Mark T. Uyeda in consultation with the Agency's Acting directors and officers, and pending the arrival of a permanent Chairman. Paul Atkins has been nominated as Chairman but has not yet been confirmed. (b)(5)

(b)(5)

- 1. A list of agency subcomponents or offices that provide direct services to citizens. Such subcomponents or offices should be included in ARRPs to improve services to citizens while eliminating costs and reducing the size of the federal government. But for service delivery subcomponents or offices, implementation shall not begin until certified by OMB and OPM as resulting in a positive effect on the delivery of such services.**

Many SEC divisions and offices provide direct services to the investing public or to companies. The chart below provides examples of these functions:

SEC Division/Office	Direct Services to Citizens
Division of Corporation Finance	<ul style="list-style-type: none"><li>• Issuing comments on company disclosures, for the benefit of investors.</li><li>• Issuing Dear CFO letters and disclosure guidance, to assist companies with their obligations under the federal securities laws.</li><li>• Issuing no-action, interpretive, and exemptive letters.</li><li>• Providing answers to public queries.</li></ul>
Division of Economic and Risk Analysis	<ul style="list-style-type: none"><li>• Publishing comprehensive data sets on sec.gov that provide investors and market participants, as well as developers and other third parties, with aggregated information from public filings for research and analysis.</li></ul>
Division of Enforcement	<ul style="list-style-type: none"><li>• Investigating potential violations of the securities laws and filing enforcement actions to obtain relief for harmed investors.</li></ul>

	<ul style="list-style-type: none"> <li>• Distributing disgorged funds and monetary penalties to harmed investors.</li> <li>• Operating the SEC’s Whistleblower Program, which provides significant incentives and protections for whistleblowers.</li> </ul>
Division of Examinations	<ul style="list-style-type: none"> <li>• Issuing Risk Alerts, to remind regulated entities of their obligations under the federal securities laws and help them improve their systems, policies, and procedures.</li> <li>• Operating the Compliance Outreach Program, which opens lines of communication between the SEC and registrants, providing public forums to share information and assist firms in assessing and enhancing their compliance and controls.</li> <li>• Providing an Examination Hotline, to answer questions that arise during an SEC examination.</li> </ul>
Division of Investment Management	<ul style="list-style-type: none"> <li>• Issuing comments on company disclosures, for the benefit of investors.</li> <li>• Issuing no-action, interpretive, and exemptive letters.</li> <li>• Providing data about the investment company and investment adviser industries to the public through sec.gov.</li> <li>• Providing staff guidance and answers to public queries.</li> </ul>
Division of Trading and Markets	<ul style="list-style-type: none"> <li>• Issuing no-action, interpretive, and exemptive letters.</li> <li>• Providing staff guidance and answers to public queries.</li> </ul>
EDGAR Business Office	<ul style="list-style-type: none"> <li>• Administering all operations related to EDGAR, which processes approximately 3,000 filings per day and serves up 3,000 terabytes of data to the public annually.</li> <li>• Providing EDGAR filer support.</li> <li>• Managing requests for EDGAR access.</li> </ul>
Office of Acquisitions	<ul style="list-style-type: none"> <li>• Providing information and outreach to businesses, including small businesses, who are interested in SEC procurement opportunities.</li> </ul>
Office of the Advocate for Small Business Capital Formation	<ul style="list-style-type: none"> <li>• Providing resources to help equip small businesses — from startup to small cap — and their investors with the tools needed to navigate capital raising.</li> <li>• Participating in events to raise awareness among small business owners and investors about capital raising.</li> </ul>
Office of the Chief Accountant	<ul style="list-style-type: none"> <li>• Responding to queries from the public about accounting, auditing, and auditor independence issues.</li> </ul>
Office of the Chief Data Officer	<ul style="list-style-type: none"> <li>• Publishing comprehensive data sets on sec.gov that provide investors and market participants, as well as developers and other third parties, with aggregated information from public filings for research and analysis.</li> </ul>
Office of Credit Ratings	<ul style="list-style-type: none"> <li>• Providing staff guidance and answers to public queries.</li> </ul>
Office of Financial Management	<ul style="list-style-type: none"> <li>• Distributing disgorged funds and monetary penalties to harmed investors.</li> </ul>

Office of Human Resources	<ul style="list-style-type: none"> <li>Assisting actual and potential job applicants.</li> </ul>
Office of Information Technology	<ul style="list-style-type: none"> <li>Supporting sec.gov, Investor.gov, EDGAR, and other public-facing systems.</li> </ul>
Office of the Investor Advocate	<ul style="list-style-type: none"> <li>Assisting with concerns, questions, or complaints from the public about the SEC or a self-regulatory organization (SRO) that is subject to SEC oversight.</li> </ul>
Office of Investor Education and Advocacy	<ul style="list-style-type: none"> <li>Operating the agency's investor assistance function, to respond to investor questions and concerns.</li> <li>Engaging in investor education events.</li> <li>Publishing Investor.gov, to provide investors with tools and information to make smart decisions and invest with confidence.</li> <li>Operating the "Check Out Your Investment Professional" service on Investor.gov.</li> <li>Issuing Investor Alerts.</li> </ul>
Office of Municipal Securities	<ul style="list-style-type: none"> <li>Issuing no-action, interpretive, and exemptive letters.</li> <li>Providing staff guidance and answers to public queries.</li> </ul>
Office of Public Affairs	<ul style="list-style-type: none"> <li>Communicating the agency's work and delivering the agency's data and other information to the public, market participants, and other stakeholders through sec.gov.</li> </ul>
Office of Support Operations	<ul style="list-style-type: none"> <li>Processing Freedom of Information Act (FOIA) and Privacy Act requests.</li> </ul>

2. **Any statutes that establish the agency, or subcomponents of the agency, as statutorily required entities. Agency leadership must confirm statutes have not been interpreted in a way that expands requirements beyond what the statute actually requires. Instead, statutes should be interpreted to cover only what functions they explicitly require.**

The federal securities laws create a comprehensive framework under which the SEC performs many functions to fulfill its mission of promoting capital formation, maintaining fair, orderly, and efficient markets, and protecting investors. Appendix 1 provides the statutory provisions mandating components or activities of the SEC's divisions and offices.

3. **All agency components and employees performing functions not mandated by statute or regulation who are not typically designated as essential during a lapse in appropriations (because the functions performed by such employees do not fall under an exception to the ADA) using the Agency Contingency Plans submitted to OMB in 2019 referenced above.**

Since January 20, 2025 the SEC has eliminated over 550 authorized positions. In addition, the SEC has approximately 180 employees who are being placed on administrative leave under the Deferred Resignation Program (DRP) and will separate by the end of the year, and another 310 employees who are participating in the SEC's Voluntary Early Retirement Authority (VERA) and/or Voluntary Separation Incentive Program (VSIP) and are separating from the agency no later than April 4, 2025. With these departures, the SEC's headcount will be reduced to approximately

4,300, and it is expected to decline further as additional employees sign up for VERA/VSIP in the coming days. This is below the lowest headcount level during the President's first term in office (which was approximately 4,340). (b)(5)

[REDACTED]

- 4. Whether the agency or any of its subcomponents should be eliminated or consolidated; and which specific subcomponents or functions, if any, should be expanded to deliver on the President's priorities.**

(b)(5)

[REDACTED]

- 5. The specific tools the agency intends to use to achieve efficiencies, including, as to each, the number of FTEs reduced and any potential savings or costs associated with such actions in Fiscal Years 2025, 2026 and 2027.**

As described in #3, above, the SEC has already used a variety of tools to achieve efficiencies, including a robust VERA/VSIP offering that is still ongoing. The agency has eliminated more than 550 authorized positions since January 20, 2025 and expects to have more than 490 employees departing through the DRP and VERA/VSIP by the end of the year, resulting in lower staffing levels than during President Trump's first term. (b)(5)

[REDACTED]

(b)(5)

[REDACTED]

**Detailed Breakout of Estimated FTE Reductions and Savings (dollars in millions)**

(b)(5)

- 6. A list by job position of all positions categorized as essential for purposes of exclusion from large-scale RIFs, including the number per each job position and total by agency and subcomponent.**

(b)(5)

- 7. The agency's suggested plan for congressional engagement to gather input and agreement on major restructuring efforts and the movement of fundings between accounts, as applicable, including compliance with any congressional notification requirements.**

The Financial Services and General Government Appropriations Act for 2024 outlines the SEC's requirements for reorganizations and reprogramming. Under this provision, the agency must consult with the House and Senate Appropriations Committees before undertaking any significant reorganization, restructuring, relocation, or closing of offices, programs, or activities. Additionally, if any of the planned reorganizations require a reprogramming of funds that exceed

the baseline amount provided for one of the agency's programs by more than \$5 million or 10%, the SEC must receive prior approval from the House and Senate Appropriations Committees before the changes can be executed. The SEC plans to comply with these requirements as it pursues reorganizations under the Executive Order and the February 26, 2025 Memorandum.

**8. The agency's timetable and plan for implementing each part of its Phase 1 ARRP.**

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## Appendix 1: SEC Division/Office Key Functions and Their Statutory Bases

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