

Clifford Chance

The Form ID Application Process

July 2026



The Form ID Application Process

The U.S. Securities and Exchange Commission (SEC) has transitioning electronic filers from EDGAR to a more secure filing platform, which is referred to as EDGAR Next. Effective March 24, 2025, the form used to apply for access to the SEC's electronic filing system, known as **Form ID**, was amended as part of the transition to EDGAR Next and is referred to as "amended Form ID." Individuals or legal entities who have not previously made any electronic filings with the SEC may use amended Form ID to apply for access to EDGAR Next. Amended Form ID will need to be used to apply for access to EDGAR Next by individuals or legal entities who had:

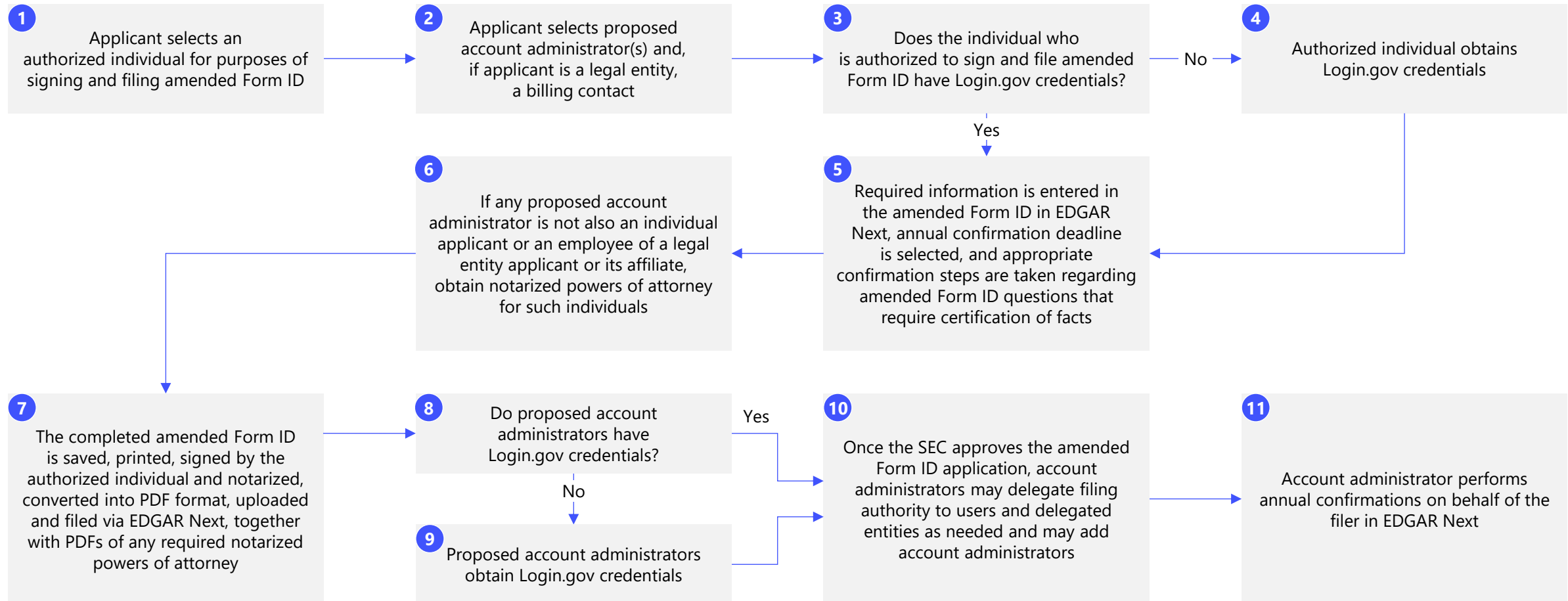
- An EDGAR account prior to March 24, 2025 but did not enroll in EDGAR Next by **December 19, 2025**; or
- An EDGAR Next account but did not submit an annual confirmation within the applicable grace period (*as discussed in Step 11 below*).

Applicants without a Central Index Key (CIK) will be issued a CIK when their application on amended Form ID is approved by the SEC. Applicants who already have a CIK when they apply for EDGAR Next access will retain that CIK. When the SEC grants a filer's Form ID application, the filer is deemed to be enrolled in EDGAR Next.

Amended Form ID has additional requirements. Unlike the prior version of Form ID, amended Form ID requires applicants to specify proposed account administrators, which are individuals authorized to manage EDGAR Next accounts. Applicants who are individuals or single-member companies are required to list only one proposed account administrator, while all other types of applicants are required to list two proposed account administrators. In addition, amended Form ID requires certifications regarding violations of federal or state securities laws to be provided for the filer, account administrator(s), any billing contact and the individual signing the amended Form ID. If the applicant is a legal entity, amended Form ID also requires certification that the applicant is in good standing in the jurisdiction of its formation.

We have prepared the following flowchart and notes to facilitate the amended Form ID application process.

The Edgar Next Application Process



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Notes



1

Amended Form ID must be signed by an individual who has authority to legally bind the applicant for purposes of amended Form ID. This person is referred to as the **“authorized individual”**.

- An authorized individual of the applicant may authorize someone else through a notarized power of attorney (POA) to sign amended Form ID on the applicant’s behalf. If amended Form ID is signed by someone who has a POA from an authorized individual, then a PDF of the notarized POA must be submitted as part of the amended Form ID application.

2

Account administrators: Amended Form ID requires applicants to list two individuals as prospective account administrators, except that individual filers and single-member companies are required to list only one account administrator. Account administrators are individuals authorized by the applicant to manage the applicant’s EDGAR NEXT account should the amended Form ID application be approved. Only natural persons may serve as account administrators.

If a prospective account administrator is not the applicant (if the applicant is an individual) or an employee of the applicant or its affiliate (if the applicant is a legal entity), then provide the full name of the prospective account administrator’s employer (and the employer’s CIK, if any). In addition, a PDF of a notarized POA authorizing the individual as an account administrator to manage the applicant’s EDGAR Next account must be submitted as part of the amended Form ID application.

Even when only one account administrator is required, filers will want to consider authorizing at least one additional account administrator in case an account administrator unexpectedly becomes unavailable. Additional account administrators may be added to an EDGAR Next account after the amended Form ID application is approved by the SEC. **See Step 10 below.**

Billing contact: If the applicant is a legal entity, it will also need to list an individual who should receive account information and/or billing invoices and who can respond to SEC questions including but not limited to those regarding account activity statements, account receivable letters, refunds, and dormant account notifications.

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Notes (continued)



3

Login.gov credentials are required for accessing [EDGAR Next](#). Each filer may only authorize individuals who have obtained account credentials through Login.gov to act on its behalf in EDGAR Next. Login.gov credentials should be obtained using the individual's business email address rather than a personal email address, because EDGAR Next uses the email address provided to Login.gov for identification and notification purposes. If an individual has existing Login.gov credentials that were created using a personal email address, such individual may consider creating new Login.gov credentials using a different email address that is intended to be used for EDGAR Next and other business purposes.

4

When an individual selects **Sign in with Login.gov** on [EDGAR Next](#), such individual will be redirected to Login.gov. Follow the instructions on Login.gov to create an account: enter your email address, create a password, and select a multifactor authentication method. Login.gov credentials should be obtained using the individual's business email address rather than a personal email address, because EDGAR Next uses the email address provided to Login.gov for identification and notification purposes. The email address will appear next to an individual's name on the EDGAR Next dashboard and be visible to others.



The Edgar Next Application Process

Notes (continued)



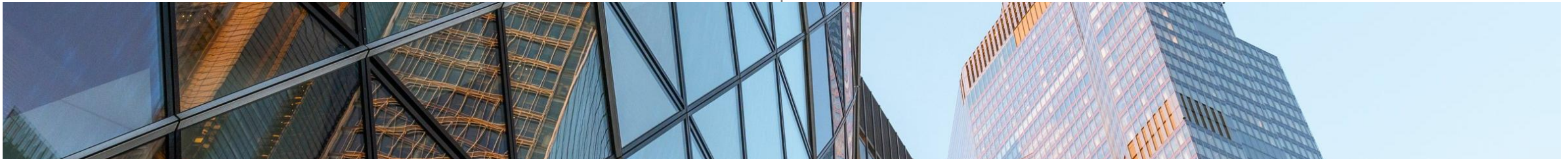
5

To prepare amended Form ID, the individual authorized by the applicant to complete and submit amended Form ID must log into [EDGAR Next](#) with such individual's own Login.gov account credentials and select the **"Apply for EDGAR Access"** option.

Amended Form ID requires certifications regarding violations of federal or state securities laws to be provided for the filer, account administrator(s), any billing contact and the individual signing amended Form ID. In addition, if the applicant is a legal entity, amended Form ID requires certification that the applicant is in good standing in the jurisdiction of its formation. Any misstatements or omissions of fact in connection with amended Form ID, including these new certifications, may constitute a criminal violation under 18 U.S.C. 1001 and 1030 and/or a violation of other criminal and civil laws. Accordingly, applicants will want to consider taking reasonable steps to obtain assurances from all relevant persons that it is making accurate representations to the SEC when completing amended Form ID. For example, a legal entity applicant will want to consider requesting a good standing certificate from the secretary of state, or equivalent agency, of its jurisdiction of formation.

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The entry of individual names in amended Form ID's fields for prospective account administrators generally constitutes the applicant's authorization of those individuals to act as its account administrators. However, a POA (specifically authorizing an account administrator to act on the applicant's behalf to manage its EDGAR Next account) will also be required when the prospective account administrator is not the same as the individual applicant or is not employed by a legal entity applicant or any of its affiliates. Such POA would need to be signed by an authorized individual and notarized (***see Step 7 below regarding notarization requirements***), and then submitted with the amended Form ID.



The Edgar Next Application Process

Notes (continued)



7

Specific position / title information is required to be provided for the individual who signs the amended Form ID. The SEC will not accept generic terms such as “authorized individual” or “officer” in the title/position field.

Amended Form ID may be signed pursuant to a notarized POA that clearly states that the individual receiving the POA has either general legal authority to bind the entity or individual or specific legal authority to bind the entity or individual for purposes of amended Form ID. If amended Form ID is signed pursuant to a POA, indicate the following in the “title / position” field of the form:

- For an applicant that is a legal entity: “By POA from [name and title/position of the authorized individual signing the POA]”
- For an applicant that is an individual: “By POA from [name of individual applicant]”.

The signature on amended Form ID must be notarized.

- The notarized signature of the authorized person must be obtained by manual, electronic, or remote online notarization recognized by the law of any state or territory of the United States or the District of Columbia and must include a manual or electronic signature of the authorized individual, as required by the notary for the type of notarization at issue.
- Non-U.S. applicants who do not have access to a U.S. notary public must use the equivalent of a notary public in their jurisdiction or obtain notarization by a remote online notary recognized by the law of any state or territory of the United States or the District of Columbia. An English translation of any non-English language in connection with a notarization should also be filed.

8

To prepare amended Form ID, the individual authorized by To access EDGAR Next, account administrators will be required to use their own Login.gov credentials. The email address of each proposed account administrator provided during the application process will need to match the email address used for such person’s Login.gov credentials. **See Step 4 above.**

9

To obtain Login.gov credentials, an individual would select **Sign in with Login.gov** on [EDGAR Next](#), which redirects to Login.gov, where instructions are provided regarding the creation of an account. Such person would be directed to enter an email address, create a password, and select a multifactor authentication method.

- These credentials should relate to such person’s business email address, rather than a personal email address, because EDGAR Next uses the email address provided to Login.gov for identification and notification purposes. The email address will appear next to such person’s name on the dashboard and will be visible to other persons.

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Notes (continued)



10

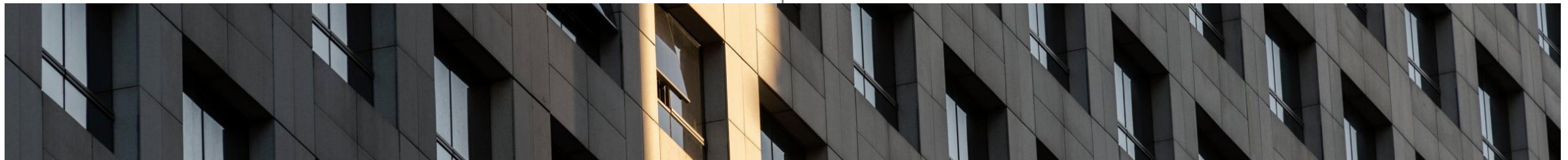
Adding account administrators and delegating filing authorization: After an amended Form ID application is approved by the SEC, a filer's account administrators can invite additional account administrators and delegate filing authority to users (persons authorized to make filings on behalf of a filer) and delegated entities in the **"My Accounts"** section of [EDGAR Next](#). A filer may have no more than 20 account administrators and no more than 500 users. All functions that can be performed by users can also be performed by account administrators. An account administrator will not need to be separately listed in EDGAR Next as a user.

- Financial printers engaged to serve as EDGAR filing agents will typically be added as a delegated entity by an account administrator.
- All persons accessing EDGAR Next will be required to use their own Login.gov credentials, including account administrators, users and technical administrators. **See Step 4 above.**
 - The email address of each person who is added as an account administrator or user will need to match the email address used by such person when obtaining Login.gov credentials.

11

Annual confirmation: To maintain a filer's EDGAR Next account, a filer will need to confirm on an annual basis that:

1. The users, account administrators, technical administrators, and/or delegated entities listed on the filer's dashboard are authorized by the filer to act on its behalf; and
 2. All information related to the filer reflected on the filer's dashboard is accurate.
- A filer's account administrator will be able to provide this annual confirmation on behalf of the filer in the **"My Accounts"** section of [EDGAR Next](#) by selecting the relevant filer and the **"Annual Confirmation"** option.
 - Annual confirmations will need to be provided by an account administrator on behalf of a filer by the annual confirmation deadline selected during the application process. There will be a three-month grace period, following which the filer would lose access to its EDGAR Next Account. Amended Form ID would need to be used to re-apply for access to EDGAR Next.



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