

**MEMO# 32640**

July 28, 2020

## **Statement by SEC Staff Standards of Conduct Implementation Committee on Form CRS Disclosures**

[32640]

July 28, 2020 TO: ICI Members  
Investment Company Directors  
Broker/Dealer Advisory Committee  
Investment Adviser and Broker-Dealer Standards of Conduct Working Group  
Investment Advisers Committee  
Operations Committee  
Pension Committee  
SEC Rules Committee  
Transfer Agent Advisory Committee SUBJECTS: Compliance  
Disclosure  
Investment Advisers  
Operations RE: Statement by SEC Staff Standards of Conduct Implementation Committee on Form CRS Disclosures

On July 27, the Securities and Exchange Commission's Staff Standards of Conduct Implementation Committee ("Committee") issued a statement ("Statement") regarding the Form CRS relationship summaries that broker-dealers and investment advisers recently have filed with the SEC.[\[1\]](#) The Statement explains that the Committee is reviewing relationship summaries filed by a cross-section of firms to assess compliance with Form CRS's requirements. The Committee observes that the relationship summaries reviewed to date reflect that firms are making an effort to meet the content and format requirements of Form CRS and that the Committee has identified examples of simple, clear disclosures. The Committee notes, however, that it also has identified examples of relationship summaries that "may lack certain disclosures or could be clearer or otherwise improved."

The Committee plans to share best practices with, and provide feedback to, firms. It notes that some firms may need to "improve their relationship summaries and determine whether any specific amendments, or broader change in their overall approach" may be appropriate. The Committee plans to hold a roundtable this fall to share additional thoughts regarding its initial review of firms' relationship summaries. The Committee references the various resources the SEC has available to assist firms as they review and further refine their relationship summaries.

Sarah A. Bessin  
Associate General Counsel

**endnotes**

[1] *Statement by the Staff Standards of Conduct Implementation Committee Regarding New Form CRS Disclosures* (July 27, 2020), available at <https://www.sec.gov/news/public-statement/staff-form-crs-2020-07-27>.

---

Copyright © by the Investment Company Institute. All rights reserved. Information may be abridged and therefore incomplete. Communications from the Institute do not constitute, and should not be considered a substitute for, legal advice.