

MEMO# 32298

March 18, 2020

2016 ICI Memo: Evaluating Fund Policies, Procedures, and Disclosure in Light of Unanticipated Events on Securities Trading Venues

[32298]

March 18, 2020 TO: ICI Members

Investment Company Directors SUBJECTS: Compliance

Disclosure

Distribution

Fund Accounting & Financial Reporting

Fund Governance

Intermediary Oversight

Operations

Technology & Business Continuity

Transfer Agency

Valuation RE: 2016 ICI Memo: Evaluating Fund Policies, Procedures, and Disclosure in Light of Unanticipated Events on Securities Trading Venues

As you continue with your contingency planning in light of market events, we want to remind you of the memo that we prepared in 2016, following an unexpected close of the New York Stock Exchange in 2015. We produced the memo following several calls with ICI members and the staff of the SEC's Division of Investment Management.

The memo explains the ways in which unanticipated disruptions in the functions of US exchanges and other trading venues can raise legal and operational issues for open-end funds, relating to trade execution, valuation of portfolio assets, pricing of fund shares, and processing transactions in fund shares. It also outlines matters that members may wish to consider as they evaluate their policies, procedures, and related disclosure.

The memo is available here: https://www.ici.org/my_ici/memorandum/memo29831

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