

MEMO# 32359

April 6, 2020

SEC Commissioner Lee Issues Statement on Regulatory Priorities and COVID-19

[32359]

April 6, 2020 TO: ICI Members
Investment Company Directors
Closed-End Investment Company Committee
ETF (Exchange-Traded Funds) Committee
ETF Advisory Committee
Investment Advisers Committee
SEC Rules Committee
Small Funds Committee
Variable Insurance Products Advisory Committee SUBJECTS: Compliance
Disclosure
Investment Advisers RE: SEC Commissioner Lee Issues Statement on Regulatory Priorities and COVID-19

SEC Commissioner Allison Herren Lee recently issued a public statement regarding her views on the Commission's regulatory approach during the COVID-19 pandemic ("Statement").[\[1\]](#) The Statement is available, and briefly summarized, below.

Commissioner Lee emphasizes that the SEC should continue to focus its regulatory efforts on the most urgent issues facing the markets and the public as a result of the current health crisis. She highlights two key considerations. First, she believes that the SEC "should move quickly and clearly to extend current and recently closed comment periods to ensure that the public has an adequate opportunity to provide full and complete comments on the Commission's proposed regulatory actions." She states that the SEC should take action now to extend all comment periods by at least 60 days, starting with those that closed in mid-March. She also states that the SEC should "state with certainty" any additional time provided to the public to submit comments.

Second, Commissioner Lee believes that the Commission should focus on the most pressing issues faced by investors, market participants, and the capital markets more broadly. She notes Chairman Clayton's recent statement highlighting the actions the Commission recently has taken to address the concerns raised by the COVID-19 pandemic.[\[2\]](#) She states that the Commission should carefully analyze each action it takes in light of the altered economic and social landscape, and she sets out a series of considerations she believes are relevant to this analysis.

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endnotes

[1] The Statement is *available at* <https://www.sec.gov/news/public-statement/statement-lee-regulatory-priorities-covid-19-2020-04-03>.

[2] For a summary of Chairman Clayton's statement, *please see* ICI Memorandum No. 32350 (Apr. 3, 2020), *available at* https://www.ici.org/my_ici/memorandum/memo32350. Interestingly, Commissioner Lee does not mention Chairman Clayton's view that the June 30, 2020 compliance date for Regulation Best Interest remains appropriate.

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