

MEMO# 33152

March 3, 2021

ICI Submits Letter on IRS Form SS-4 Responsible Party Requirements

[33152]

March 3, 2021 TO: ICI Members
Management Company Tax Subcommittee
Tax Committee SUBJECTS: Fund Accounting & Financial Reporting
Privacy
Tax RE: ICI Submits Letter on IRS Form SS-4 Responsible Party Requirements

The Investment Company Institute submitted the attached letter recommending an improvement to Internal Revenue Service (IRS) Form SS-4, Application for Employer Identification Number (EIN). Specifically, we recommended that a “responsible person” requesting an EIN for a regulated investment company (RIC) or other entity be permitted to provide his or her Preparer Tax Identification Number (PTIN) rather than his or her social security number (SSN).

The letter describes why permitting responsible parties to obtain and use PTINs would improve transparency and security to the EIN process and provide significant privacy protections to individual employees.

Katie Sunderland
Assistant General Counsel

[Attachment](#)