

Subcommittee Name	Description
Definitions	<ul style="list-style-type: none"> • Clarify affiliated, associated, and persons involved and all implications thereof. • Also, definition of capital to deal with both “unfettered access” from trust, and “results in withdrawal”.
Forms	<ul style="list-style-type: none"> • Technical form filling issues • Form redundancies • Who must fill forms (956H for indiv investors, entities). • Also, process for receipting and cashing checks and providing ID numbers. • How do investors interfile when ID assigned. • How do NCE’s/RC’s interfile if Form D’s filed after initial 956F
Pre-Settlement 956 Filing Issues	<ul style="list-style-type: none"> • How to adjust early 956 filers and combine with existing RCs based on settlement.
Third-Party Promoters (956K)	<ul style="list-style-type: none"> • Permissible fee arrangements • Subagents (what is 3rd party promoter); individual personnel at agents can’t be required. • How to monitor registration, etc. • Also, what specific info to require in 526E
Rural Priority Processing	<ul style="list-style-type: none"> • Priority for just 526E petitions? • How does 956F affect priority processing? • Does F need to be approved before 526E is taken up first? • Will rural 956F’s get priority processing before non-rural 956F’s?
Redeployment	<ul style="list-style-type: none"> • What is the sustainment period based on drafting of law?
Fund Admin/Audit	<ul style="list-style-type: none"> • Retroactive or prospective • Required just during initial funding, or for longer? • For mandatory waiver based on annual audits of “NCE or JCE”: does that really mean “or” or does it mean “and” when the deal has both? Maybe just affiliated JCE needs audit? • For discretionary waiver based on NCE or affiliated JCE under control of IA or BD, what does “under control of” mean?
TEA (high unemployment)	<ul style="list-style-type: none"> • Set standards for data used and time periods used.

IIUSA RIA Subcommittee Discussion Topics

