

SEC and CFTC Further Extend Compliance Date for 2024 Form PF Amendments

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On August 31, 2026, the Securities and Exchange Commission (the “SEC”) and the Commodity Futures Trading Commission (the “CFTC”) announced a further extension of the compliance date for the Form PF amendments adopted in February 2024, from October 1, 2026 to July 1, 2027.

The latest extension follows the SEC and CFTC’s April 20, 2026 proposal to further amend Form PF. The proposed amendments would materially reduce certain reporting burdens by eliminating specified filing and reporting requirements. If adopted, the proposal would effectively roll back significant portions of the 2024 amendments before advisers are required to comply with them. In connection with the extension, SEC Chairman Paul S. Atkins noted that the additional time would permit the agencies to continue their consideration of those amendments and the comments received on the proposal, which included comments submitted by [Proskauer](#). In his August 31 remarks, Chairman Atkins stated that “[g]iven the importance of this information collection effort and its technical nature, a short extension is practical and necessary.”

The compliance date for the 2024 amendments, which significantly expanded Form PF reporting requirements, has been extended several times^[1] and, prior to the SEC and CFTC’s August 31, 2026 action, had been scheduled for October 1, 2026.

For the time being, private fund advisers should continue to comply with the existing Form PF reporting framework and monitor further developments regarding the proposed amendments. Please contact Proskauer’s Private Investment Funds team for additional information regarding the amendments and their implications.

^[1] The 2024 amendments were initially scheduled to become effective on March 12, 2025. The SEC and CFTC subsequently extended the compliance date to June 12, 2025, then to October 1, 2025, and thereafter to October 1, 2026.

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