Private Funds
Alert

September 1, 2026

SEC Further Extends Compliance Date for Form PF Amendments

By Christopher Mulligan, Christopher Scully, David Wohl, Andrew Dean, John Bradshaw, Stephen Filocoma and Jake Pero

On August 31, 2026, the Securities and Exchange Commission (the "**SEC**" or "**Commission**") announced that it would again extend the compliance date for the February 8, 2024 Form PF amendments to July 1, 2027.[1] The previous compliance date was October 1, 2026 after a series of preceding extensions. Following this extension, annual filers will not be required to use the amended version of Form PF until submitting filings covering the 2027 calendar year (due April 30, 2028). Quarterly filers will not be required to use the amended version of Form PF until submitting filings covering Q2 2027 (due August 29, 2027).

As a reminder, the amendments will require all private fund advisers to:

1. Separately report each component fund of a master feeder arrangement and parallel fund structure, other than a disregarded feeder fund (i.e., a feeder fund that invests all of its assets in a single master fund, US treasury bills, and/or cash and cash equivalents);
2. Include the value of investments in other private funds (including internal and external private funds) when determining whether the adviser is required to file Form PF and whether the adviser meets certain reporting thresholds;
3. Report additional information concerning the adviser and the private funds it advises, including: (i) general identifying information; (ii) assets under management attributable to advised private funds; (iii) withdrawal and redemption rights granted to private fund investors; and (iv) funds' (1) gross asset value and net asset value, (2) inflows and outflows, (3) base currency, (4) borrowings and types of creditors, (5) beneficial ownership information and (6) performance.

Advisers with questions on completing the amended Form PF following the compliance date should reach out to the Weil Private Funds Regulatory team.

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[1] A link to a statement regarding the deadline extension can be found here. A link to the final rule can be found here.

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