

# Short Sale Reporting Preparation Timeline for Institutional Managers



## Preparation timeline

### Initial assessment and education

**Timeframe: 3-4 months**

*(February - April)*

- » **Review:** Assess whether and how SEC Exchange Act Rule 13f-2 applies to your business
  - » Review reporting thresholds and identify short sale positions requiring reporting
  - » Evaluate systems for necessary upgrades or gaps
- » **Educate:** Ensure all relevant stakeholders fully understand the rule's requirements
  - » Provide training on SEC Rule 13f-2 and Form SHO deadlines
  - » Clarify data required for Form SHO and filing deadlines
- » **Evaluate:** Determine whether changes are needed in policies, systems, or reporting practices
- » **Assess:** Review your firm's existing compliance policies to identify any areas that require modification to meet SEC Rule 13f-2 reporting requirements

### Compliance planning and implementation

**Timeframe: 3-4 months**

*(May - October)*

- » **Collaborate with internal teams:** Discuss changes to existing policies, systems, and procedures
- » **Appoint:** Designate an individual or team responsible for overseeing short sale reporting
  - » Assign responsibility for managing SEC Rule 13f-2 compliance and reporting
  - » Ensure the appointed team has sufficient authority and resources
- » **Collaborate with intermediaries:** Work with third-party service providers (e.g., custodians, brokers) to align on reporting requirements
  - » Review and update contracts to ensure they meet compliance needs
  - » Establish reporting protocols with intermediaries to ensure accurate data exchange
- » **Implement policies:** Adapt internal systems and procedures to accommodate SEC Rule 13f-2

### Final preparation and training

**Timeframe: 3-4 months**

*(November - February)*

- » **Train:** Provide comprehensive training to personnel on new reporting requirements
- » **Test and make final adjustments:** Conduct final reviews and ensure all systems, policies, and personnel are fully prepared for Form SHO filings
  - » Review and test reporting systems for accuracy and efficiency
- » **Confirm** that the firm is capturing and can easily report all required data
  - » Ensure that all teams are fully prepared to meet deadlines for Form SHO submissions

**First Form SHO filing**

**February 17, 2026**

*for the January 2026 reporting period*

# Our solutions

We offer outsourced managed services and regulatory technology to help ensure accurate and timely Form SHO reporting:

- » Provide a Form SHO template for data collection
- » Ensure that all short position holdings are accurately represented
- » Generate draft(s) for client approval
- » Submit and confirm submission of Form SHO within 14-day window
- » Answer client queries about the intricacies of Form SHO

# How we help

Boost efficiency and reduce risk by outsourcing your regulatory filing tasks. Our dedicated team and technology solutions can help you simplify your processes, save time, and enhance business outcomes.

- » **Outsource with confidence:** Leave the complexity of drafting, reviewing, and filing your firm's U.S., UK, and EU filing needs to us.
- » **Enhance efficiency:** Free up your team to focus on strategic initiatives while we manage the routine, yet critical process of preparing and submitting your regulatory filings.
- » **Mitigate risks:** Gain peace of mind knowing our experts are proactively managing your regulatory filings, reducing operational risk, and boosting your firm's resilience.

Whether you are looking to launch, grow, or protect your business, our services help ensure compliance and confidence at every stage.

**Ready to enhance your regulatory filing process?** Reach out to your ACA consultant or [contact us](#) today to learn more about our regulatory filing solutions

## For more information

To speak with someone directly, please contact:

- » Email: [info@acaglobal.com](mailto:info@acaglobal.com)
- » Our U.S. Team: +1 (212) 951-1030
- » Our UK Team: +44 (0) 20 7042 0500

Or visit [www.acaglobal.com](http://www.acaglobal.com).