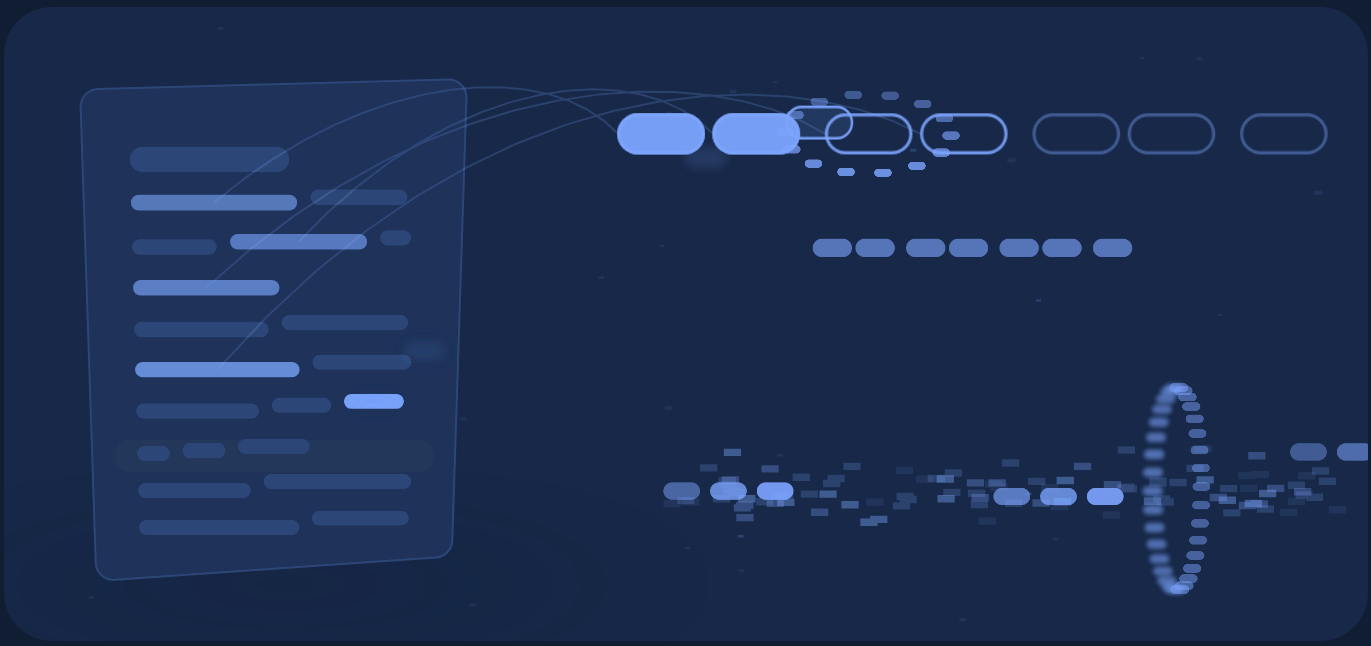
Rillor

EXPLAINER

Regulatory change management from official sources

What the Federal Register API, the eCFR, the Unified Agenda, self-regulatory rule filings and legislation.gov.uk publish about a rule change, and how far each can be relied on.



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rillor.com/insights/regulatory-change-management-official-sources

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Summary

Regulatory change management rests on a few official sources, and each publishes different fields, dates and caveats about the same rule change.

- The Federal Register API returns Federal Register documents published since 1994, with fields such as `effective_on`, `cfr_references` and the regulation identifier number (RIN), needs no key and is not an official legal edition [4]. Of 2,472 rule documents published from 1 January to 31 October 2026, 251 had no `effective_on` value (computed for this report from [8]).
- Under 5 U.S.C. 553(d), a substantive rule is published at least 30 days before it takes effect, unless it grants an exemption or relieves a restriction, interprets or states policy, or the agency finds good cause [24]. Of 2,221 Federal Register rule documents from January to October 2026 with an effective date, 835 took effect on or before publication (computed for this report from [8]).
- Compliance dates move apart from effective dates. The compliance date of the Form PF amendments that the Securities and Exchange Commission (SEC) and the Commodity Futures Trading Commission (CFTC) published in March 2024 moved four times, from 12 March 2025 to 1 July 2027 [7].
- The Electronic Code of Federal Regulations (eCFR) keeps dated versions of sections of the Code of Federal Regulations (CFR) [20, 21], calls its content "authoritative but unofficial" and typically integrates an amendment about two business days after its effective date [15, 16, 23].
- The Unified Agenda lists the rules federal agencies plan, and its dates are forecasts. In the Spring 2013 agenda, 41% of economically significant proposed rule entries had not been published 16 months later [31].
- Self-regulatory organizations such as exchanges mark rule changes on Form 19b-4 with brackets for deleted words and underscoring for added ones [34]. Of 1,478 SEC notices about their filings from January to October 2026, 1,105 announced changes effective on filing (computed for this report from titles in [9]).
- One SEC rule shows the gaps: published on 6 November 2026 and effective 4 February 2027, its Federal Register record had no `effective_on` value on 7 November, and the eCFR still showed the old $25 million threshold [5, 6, 23].

Background

What supervisors expect

Supervisors of banks and consumer finance firms state what a change program must produce.

The Compliance Management Review of the Consumer Financial Protection Bureau (CFPB), part of its Supervision and Examination Manual and dated August 2017, has examiners assess the "effectiveness of the institution's change management processes" [1]. Its objectives ask institutions to respond promptly to changes in federal consumer financial laws "by evaluating the change and implementing responses across impacted lines of business", and to review a change after implementation [1]. Examination procedure 10 reads "Review processes for the identification of new regulatory requirements, changes in requirements, and planning for implementation" [1]. Training is to be updated in advance of "the effective date of new or changed consumer protection laws and regulations" [1].

The Federal Financial Institutions Examination Council (FFIEC) uses the same wording in its Uniform Interagency Consumer Compliance Rating System, effective 31 March 2017. Its member agencies include the Federal Reserve Board, the Consumer Financial Protection Bureau, the Federal Deposit Insurance Corporation, the National Credit Union Administration and the Office of the Comptroller of the Currency [2]. A 1 for change management goes to management that "anticipates and responds promptly to changes in applicable laws and regulations", and a 5 to management that "fails to monitor and respond" to them [2].

The Office of the Comptroller of the Currency (OCC), in the Compliance Management Systems booklet of its Comptroller's Handbook (version 1.0, June 2018), says management "should have a process to identify laws and regulations applicable to the bank's activities and stay abreast of evolving regulatory requirements" [3]. To test completed change work, examiners review "project management tracking records, applicable committee meeting minutes, adopted policies and procedures related to the change, and monitoring or audit reports" [3]. The booklet also expects systems and applications to be included in change management "to re-test results when regulatory changes occur" [3].

Three needs follow. A change has to be found when it is published, its dates known before the rollout, and its review recorded so an examiner can read it.

Who this is for

This report is for compliance officers and regulatory technology engineers who detect rule changes that affect their firm and must show they reviewed them. The report describes what each official source publishes and the limits it states about itself. It is research and gives no legal advice.

Method

What was examined. The Federal Register and its API, the statutes that set effective dates, the eCFR and its versioner service, the List of CFR Sections Affected, the Unified Agenda, the SEC's records of self-regulatory organization filings and the United Kingdom's record of changes to legislation. For each, the publisher's own documentation was read for what it publishes, which fields carry dates and what it says about its legal status.

Queries. On 7 November 2026 the Federal Register API was queried for SEC final rules by publication date [5], for every rule document published from 1 January to 31 October 2026 with its effective date, for document counts by type in 2024 to 2026 [8], and for SEC notices in the same 2026 period [9]. The eCFR's titles and versioner services were queried the same day [19, 21, 22]. Every query URL is in the Sources, and the 2026 rule and SEC notice lists each run to three pages (page=1 to page=3). Federal Register counts can move by a few documents as corrections are posted.

How. Figures labelled "computed for this report" are counts taken from those results. The gap to the effective date is the number of days from `publication_date` to `effective_on`. SEC notices were sorted by title only. The worked example in Finding 7 is the SEC final rule the API listed first by publication date on 7 November 2026 [5]. All sources were opened on 7 November 2026.

Findings

1. Proposed and final rules in the Federal Register API

What the API offers. The API needs no key, only an HTTP client or browser [4]. Its documents endpoint searches Federal Register documents published since 1994 and returns up to 1,000 per request [4]. Filters include document type, effective date, CFR title and part, agency, docket, RIN and significance under Executive Order 12866 [4]. Records can return `effective_on`, `cfr_references`, `dates`, `action`, `comments_close_on`, `regulation_id_numbers`, `corrections`, `amendatory_instructions`, `significant` and links to the PDF, raw text and XML [4].

Period	Rule	Proposed Rule	Notice	Presidential Document
2024	3,248	1,769	25,506	307
2025	2,441	1,498	19,280	471
1 January to 31 October 2026	2,472	1,498	17,505	228

Table 1. Federal Register documents by type, from the API's type facets, run on 7 November 2026 [8].

Legal status. FederalRegister.gov "is not an official legal edition of the Federal Register, and does not replace the official print version or the official electronic version on GPO's govinfo.gov" [4]. Each document links to its official PDF on govinfo.gov [4].

Public inspection. The Office of the Federal Register files each document for public inspection at least one business day before publication, under 44 U.S.C. 1503 and 1507, posting a new set on or about 8:45 a.m. Eastern Time [11]. It calculates and inserts effective dates and comment dates after documents go on file, and documents on public inspection are only tentatively scheduled because agencies may withdraw them [11]. The API has an endpoint for the documents currently on public inspection [4].

What the structured fields miss. The API counted 1,026 SEC documents of type Rule on 7 November 2026 [5]. The first in the list, published on 6 November 2026, amends the small business and small organization definitions for investment companies and investment advisers [5, 6]. Its `effective_on` is empty, and its `dates` field says only that it was published on 6 November [5]. The effective dates sit in the DATES paragraph, one line for each group of sections: amendments to rules 0-10 and 0-7 take effect on 4 February 2027, and amendments to rule 203-3 and Form ADV take effect, with a compliance date, the same day [6].

Across all agencies, 251 of the 2,472 rule documents published from January to October 2026 had no `effective_on` (computed for this report from [8]). They included a comment period extension, an inseason fishery action with its dates under a separate heading and a final rule extending a compliance date to 20

January 2027 [8]. A monitor that keys on `effective_on` alone misses them, and the DATES text and amendatory instructions carry what the field leaves out [4, 6].

The official cross-check. The Office of the Federal Register's List of CFR Sections Affected lists proposed, new and amended regulations published since each CFR title's last revision, with the section, its status and the Federal Register page [14]. It is cumulative, issued monthly and held on GPO's GovInfo from 1997 [14].

2. Effective dates and their exceptions under 5 U.S.C. 553(d)

The statute. Section 553(b) requires notice of proposed rule making in the Federal Register, including the Internet address of a summary of not more than 100 words, with exemptions for interpretative rules, policy statements, procedural rules and good cause [24]. Section 553(d) requires that a substantive rule be published at least 30 days before its effective date, with three exceptions: a rule that grants or recognizes an exemption or relieves a restriction, interpretative rules and statements of policy, and cases "otherwise provided by the agency for good cause found and published with the rule" [24]. Section 553(a) excludes military and foreign affairs functions and matters such as agency personnel, loans, grants, benefits and contracts [24].

The Congressional Review Act sets a floor for major rules: no earlier than 60 days after Congress receives the agency's report or after the rule's publication, whichever is later [25]. Other rules take effect as otherwise provided by law after submission to Congress [25].

Counting the days. The Office of the Federal Register counts the day after publication as the first day and moves a date that falls on a weekend or holiday to the next federal business day, under 1 CFR 18.17 [12]. For a document published on 6 November, its table gives 7 December for 30 days, 5 January for 60 and 4 February for 90 [12]. The 30th day, 6 December 2026, is a Sunday (computed for this report). The SEC rule above takes effect on the 90-day date [6, 12]. A rule can carry split effective dates, listed in DATES with their amendatory instructions [13].

Gap from publication to `effective_on`	Rule documents	Share of those with a date
Before publication	133	6.0%
Same day	702	31.6%
1 to 29 days	297	13.4%
30 days or more	1,089	49.0%
of which 30 or 31 days	326	14.7%

Gap from publication to `effective_on`	Rule documents	Share of those with a date
of which 60 or 61 days	77	3.5%
With an `effective_on`	2,221	100%
Without an `effective_on`	251	

Table 2. Federal Register rule documents published from 1 January to 31 October 2026, all agencies. Computed for this report from [8]. Median gap 24 days.

The Rule type also covers corrections, temporary safety-zone rules, interim final rules and compliance-date extensions, so these counts describe a wider set than substantive rules [8]. One documented case of a date before publication is a rule effective on public inspection, which comes at least one business day before publication [11, 16]. The eCFR shows such a rule with the publication date as its effective date [16]. The query does not show how many of the 133 are of that kind.

Compliance dates. The Document Drafting Handbook separates the two dates. The effective date "is the date the rule affects the current CFR", and the compliance or applicability date "is the date the person must comply" [13]. An agency delays a date that has not passed and stays one that has, and a compliance date may be stayed after it has passed because it "affects the user, not the CFR" [13].

The Form PF amendments, published on 12 March 2024, had one effective and compliance date, 12 March 2025 [7]. The compliance date moved to 12 June 2025, then 1 October 2025, then 1 October 2026, and a joint SEC and CFTC rule of 3 September 2026 moved it to 1 July 2027 [7]. That release took effect on its publication date, the only date its `effective_on` holds [5, 7].

3. Point-in-time text in the eCFR, and its legal status

Legal status. The eCFR calls itself "an editorial compilation of CFR material and amendments published in the daily Federal Register", updated daily, and asks those relying on it for legal research to verify against the official CFR, the daily Federal Register and the List of CFR Sections Affected [15]. Its pages carry the banner "This content is from the eCFR and is authoritative but unofficial" [15, 23].

How it is updated. The eCFR is "generally ... current within two business days", and amendments "are typically available about 2 business days after their effective date" [16]. A future amendment appears first as a cross reference in the affected content, and that does not guarantee it takes effect as published, because agencies may correct, delay or withdraw it [16]. The eCFR advises checking the day after a regulation is scheduled to take effect [16].

Its dates. The titles service reports `latest_amended_on`, `latest_issue_date` and `up_to_date_as_of` for each title, and an `import_in_progress` flag [18]. A substantive change reflects a regulatory change in the Federal Register or, more rarely, an editorial correction, and a non-substantive change does not affect legal meaning [18]. On 7 November 2026 the service reported an import in progress, with title 17 last amended on 19 October and up to date as of 5 November [19].

Point-in-time versions. The eCFR splits its source XML into smaller units and tracks them over time, and its API needs no key [20]. The full-text endpoint returns a title as XML for a given date and requires a request that accepts compression: without it, a request on 7 November 2026 received HTTP 406 [20]. Other endpoints list each section's versions and the eCFR's corrections [20].

Section	Versions	Substantive	`latest_amendment_date` in the versioner	Source
17 CFR 232.405, interactive data files	47	45	24 March 2025	[21]
17 CFR 275.0-7, small entities under the Advisers Act	1	1	31 December 2016	[22]

Table 3. Version histories from the eCFR versioner, run on 7 November 2026. Each version carries `date`, `amendment_date`, `issue_date`, `substantive` and `removed` [21]. For 17 CFR 275.0-7 that date is the versioner's first stored version, the start of its record, and the SEC's final rule says the definitions were last amended in 1998 [6, 21, 22].

The versioner lists a single version of 17 CFR 275.0-7, so its text has not changed within the eCFR's record [22]. A version history shows when text changed within the record, and the Federal Register document shows why. Email subscriptions can follow one section, a title, an agency or a search [17].

4. Horizon scanning with the Unified Agenda

What agencies must publish. Executive Order 12866 requires each agency to "prepare an agenda of all regulations under development or review", each entry with at least a RIN, a summary, the legal authority, any legal deadline and an agency contact, and independent regulatory agencies are included [27]. The Regulatory Flexibility Act separately requires an agenda each April and October of rules likely to have a significant economic impact on a substantial number of small entities, with an approximate schedule [26].

What RegInfo.gov holds. The Unified Agenda "reports on the actions administrative agencies plan to issue in the near and long term", with editions from fall 1995 [28]. It is compiled twice a year, and agency agendas list the actions agencies plan to bring to an advance notice, a proposed rule or a final rule within 12 months, with long-term actions apart [28]. The 2026 Unified Agenda, introduced in the Federal Register on 14 August 2026, has agendas from 78 federal agencies in its complete online edition [30]. The agenda's introduction says each

timetable gives the dates and citations of past steps and a projected date for at least the next one, typically a month and year without a day [30, 32]. The 2026 entry for RIN 3235-AN39 lists only the proposal and the end of its comment period, with no projected date for a final rule [29].

How far the dates hold. The 2026 introduction says "dates and schedules are subject to change" and that actions "may occur before or after the dates they have listed" [30]. The Congressional Research Service notes that no penalty applies to a rule issued without prior agenda notice, that some listed actions are never finalized and that editions have tended to appear later than April and October [32]. The spring 2023 edition appeared in the Federal Register on 27 July 2023 and the fall edition on 9 February 2024 [32].

Agenda edition	Stage	Entries	Not published 16 months later	Source
Spring 2010	Proposed rule	60	30 (50%)	[31]
Spring 2010	Final rule	65	28 (43%)	[31]
Spring 2013	Proposed rule	69	28 (41%)	[31]
Spring 2013	Final rule	65	30 (46%)	[31]

Table 4. Economically significant entries (Spring 2010: economically significant or major), from Curtis W. Copeland's 2015 draft report for the Administrative Conference of the United States [31]. The Spring 2013 final rule count is of entries not finalized in some way by November 2014.

The report quotes an OIRA data call of August 2014: "many entries are listed with projected dates that have simply been moved forward year after year, with no action taken" [31]. One FDA rule appeared in 18 consecutive editions before its publication in February 2014 [31].

Joining agenda and rule. The RIN joins the stages. The 2026 entry for RIN 3235-AN39 shows the SEC's small entity definitions at the proposed rule stage, with the proposal published on 12 January 2026 at 91 FR 1107 and comments closing on 13 March 2026, and marks it "Major: Undetermined" [29]. The final rule's API record carries the same RIN [6]. The records differ on priority: "Other Significant" in the 2026 entry, and "Substantive, Nonsignificant" in the API's RIN information, drawn from agenda issue 202504 [6, 29]. A register that joins on the RIN keeps each value with the edition it came from.

5. Self-regulatory organization rule filings and how they mark changes

Who files. The SEC's rulemaking page for self-regulatory organizations links an index of filings for each: national securities exchanges, FINRA, registered clearing agencies, the MSRB and others [33].

How changes are marked. Form 19b-4 instructs that changes to an existing rule "shall be set forth with brackets used to indicate words to be deleted and underscoring used to indicate words to be added" [34]. For amendments to a filing, the stated purpose of the marking is "to maintain a current copy of how the text of the existing rule is being changed" [34].

When changes take effect. Under Rule 19b-4(f), a change may take effect upon filing under Section 19(b)(3)(A) if it is, among other things, a stated policy or interpretation of an existing rule, a due or fee applicable only to members, or concerned solely with the organization's administration [34]. The Commission may summarily suspend such a change within 60 days of filing [10, 34].

Where the text sits. Each organization must post each proposed rule change on its website within two business days after filing [34]. It must also keep a current and complete version of its rules there, updated within two business days after notice of approval or of an immediately effective change [34].

SEC notices, 1 January to 31 October 2026	Count
All SEC notices	2,089
Titles beginning "Self-Regulatory Organizations"	1,478
of which "Notice of Filing and Immediate Effectiveness"	1,105
of which other notices of filing	193
of which approval orders	83
of which other orders and designations	97

Table 5. Computed for this report from the titles of SEC notices returned by the Federal Register API [9]. Each other title counts once, at its first match in this order: a notice of filing, an approval order, a designation of a longer period, an order instituting proceedings. The last row combines 71 designations of a longer period for Commission action, 17 orders instituting proceedings and 9 other titles [9].

About three in four of those notices announced changes filed to take effect on filing (computed for this report from [9]).

One filing, dated. NYSE American LLC filed a change to its Rule 928NYP on 19 May 2026, and the notice appeared in the Federal Register on 28 May, nine days later [10]. The notice points to the exchange's website for the rule text [10]. The filing used Rule 19b-4(f)(6), under which the change may not become operative for

30 days from filing unless the Commission designates a shorter time [10]. The rule text sits on the organization's website, which must post the filing within two business days, and in this case the Federal Register notice came nine days after filing [10, 34].

6. Consolidated text lags: unapplied effects

legislation.gov.uk lists the repeals, amendments and other effects that later legislation makes: changes made by all UK legislation enacted from 2002 and by secondary legislation enacted from 1971 [35]. Changes made before 2002 are already incorporated in the primary legislation's text [35]. A change usually appears in the lists within two weeks of the new legislation's publication, and busy periods can take longer [35]. The editorial team then applies each effect to the revised text. Until it does, the unapplied changes are displayed alongside the provision they affect, and a search for unapplied changes returns them [35].

The revised text and the list of effects can disagree on a given day, and the list records what has changed. The federal system has the same gap. The eCFR shows a future amendment as a cross reference until it is integrated [16], and the List of CFR Sections Affected records changes since each title's last revision [14]. A monitor that reads consolidated text alone sees a change only once it has been applied.

7. From a detected change to re-review of affected register rows

Step	Date	Source	What it shows
Agenda entry, RIN 3235-AN39	2026 edition	[29]	Proposed rule stage, CFR citations for four sections
Proposed rule, 91 FR 1107	12 January 2026	[29]	Comment period ending 13 March 2026
Final rule, 91 FR 69955, FR Doc 2026-22741	6 November 2026	[5, 6]	Same RIN, CFR parts 270, 275 and 279, `effective_on` empty
eCFR text of 17 CFR 275.0-7	Up to date as of 5 November 2026	[23]	$25 million threshold, $5 million total-assets test
Effective date	4 February 2027	[6, 12]	90 days after publication
eCFR integration	About two business days after 4 February 2027	[16]	The eCFR's stated practice
Commission order on the threshold	On or about 1 March 2037, then about every ten years	[6]	Dollar amount set by order

Table 6. One change followed through each official source, all checked on 7 November 2026.

What changes. On 7 November 2026, paragraph (a)(1) of 17 CFR 275.0-7 reads assets under management "of less than $25 million", and (a)(2) adds a test of total assets of $5 million or more [23]. The final rule rewrites (a)(1) to read "of less than $1 billion, or, following March 1, 2037, the dollar amount specified in the most recent order issued by the Commission in accordance with paragraph (c)", and eliminates the threshold based on total assets [6]. New paragraph (c) adjusts the amount by Commission order, using the Personal Consumption Expenditures Chain-Type Price Index [6].

Finding the rows. The API's `cfr_references` gives the parts, and the amendatory instructions name the sections, as in "Revise Sec. 275.0-7 to read as follows" [6]. The part narrows the candidates, and the section and paragraph identify the passages. The rows read from 275.0-7(a)(1) and (a)(2) go back to review. Each keeps the eCFR version it was read from, the 6 November document as the source of the change and 4 February 2027 as the date the new text applies [6, 23].

After review. A delay or correction arrives as its own Federal Register document, as the Form PF extensions did [4, 7, 13], and the eCFR advises checking it the day after the change takes effect [16]. From 2037 the threshold sits in a Commission order, so that row's sources include the order as well as the CFR [6]. Each step leaves the kind of record the supervisors name: tracking records, minutes and adopted procedures [3], and training updated before the effective date [1].

Implications

For compliance officers. Build the watch list from the CFR parts and RINs the firm's obligations rest on, since the API filters on both [4]. Public inspection gives at least one business day of notice [11]. Record the effective date and the compliance date from the DATES text, because a compliance date can move several times [7, 13]. Treat agenda dates as forecasts and the RIN as the link between stages [29, 30, 31]. For self-regulatory organizations, watch the SEC's index pages and each organization's posted rules [33, 34]. Keep the records an examiner asks for [1, 3].

For regulatory technology engineers. Read the DATES text and amendatory instructions, because `effective_on` was empty for about one rule document in ten from January to October 2026 (computed for this report from [8]). Check `import_in_progress` and `up_to_date_as_of` before comparing eCFR versions, and accept compression on the full-text endpoint [18, 19, 20]. Use the corrections endpoint and the Federal Register's `corrections` field for later fixes [4, 20]. Store each value with the edition it came from [6, 29].

For both. The eCFR and FederalRegister.gov say they are not official legal editions [4, 15]. A review that needs legal certainty checks the official PDF on govinfo.gov and the List of CFR Sections Affected [4, 14].

Where Rillor fits. Rillor reads obligations registers from regulation text, one row per obligation, and every row links to the passage it came from. When a rule changes, it compares the new version of the text with the one each row was read from. Rows tied to a changed passage go back to review, and each row keeps its source version and every change since.

Limits of this analysis

- This report describes what public sources publish. It is not legal advice and does not say which rules apply to any firm.
- Federal Register counts were taken on 7 November 2026 and can move as corrections are posted. The Rule type includes corrections, temporary rules, interim final rules and compliance-date extensions [8].
- The SEC notice counts come from titles only [9], and only one filing was read in full [10].
- No eCFR integration lag was measured. The report gives the eCFR's own statements [16].
- The Unified Agenda track record comes from 2010 and 2013 samples of economically significant entries, in a report whose views are its author's [31]. No newer systematic study was found.
- The worked example is one rule, and whether it is a major rule was not checked [29].
- How quickly self-regulatory organizations post rule text in practice was not measured [34].
- European Union sources are not covered. The United Kingdom is covered only from legislation.gov.uk's own page [35].
- Supervisory expectations come from the CFPB, the FFIEC and the OCC [1, 2, 3].
- No regulatory change software was reviewed or compared.

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