INDIALAW



INSOLVENCY & BANKRUPTCY

Streamlining Insolvency Administration: The Final Demise of Form IP-1 and the New Assignment-Module Regime

AUTHOR Shrishail Kittad, Rahul Sundaram

PUBLISHED 30 July 2025

On 14 July 2025 the Insolvency and Bankruptcy Board of India quietly closed a chapter that began six years earlier. By Circular No. IBBI/CIRP/86/2025 the Board formally withdrew Form IP-1, the once-ubiquitous filing that every Insolvency Professional had to submit when accepting an assignment under the Insolvency and Bankruptcy Code, 2016. The withdrawal is not an isolated tweak; it is the culmination of a carefully sequenced digital overhaul that commenced with the Assignment Module introduced in February 2025 and reached its crescendo with the debut of forms CP-1 to CP-5 in May 2025. Together these measures mark IBBI's definitive pivot from static, paper-centric compliance to dynamic, portal-driven governance.

The Original Mandate of Form IP-1

Introduced on 14 August 2019 through Circular IBBI/CIRP/023/2019, Form IP-1 was conceived as a sentinel. It obliged every Insolvency Professional (whether acting as Interim Resolution Professional, Resolution Professional, Liquidator, Bankruptcy Trustee or in any other capacity envisaged by the Code) to file a one-time notice that captured the assignment's basic contours. The Board's stated purpose was monitoring: by aggregating granular data on who was accepting which mandates, IBBI hoped to detect conflicts of interest, prevent forum shopping and build a macroscopic view of the insolvency ecosystem.

The First Shift: Real-Time Reporting via the Assignment Module

Yet static forms quickly proved inadequate for a marketplace where appointments, resignations and replacements can occur overnight. Responding to this velocity, Circular IBBI/LIQ/82/2025 dated 11 February 2025 mandated that every IP report each appointment instantaneously through the Assignment Module hosted on the IBBI's electronic portal. The Module is not merely a digital replica of Form IP-1; it is a living ledger that timestamps events, triggers compliance alerts and interfaces with other modules such as public announcements and creditor communications. By requiring disclosure across every species of proceeding (Corporate Insolvency Resolution Process, Liquidation, Voluntary Liquidation, Personal Guarantor Insolvency and Bankruptcy, and Financial Service Provider proceedings) the Board ensured that no assignment could escape supervisory sightlines.

The Second Shift: CP-1 to CP-5 Replace CIRP Forms 1-8 and IP-1

Circular IBBI/CIRP/85/2025, issued on 26 May 2025, unveiled a suite of five new forms, CP-1 through CP-5, designed to supplant both the erstwhile CIRP Forms 1 to 8 and, by necessary implication, Form IP-1. This was effective from 1 June 2025, Because these forms are lodged within the same portal that hosts the Assignment Module, the Board now enjoys end-to-end visibility: from the moment an IP is appointed to the instant a resolution plan is approved or liquidation commences.

Legal Sanction for Withdrawal

Section 196 of the Insolvency and Bankruptcy Code, 2016 clothes the Board with authority to issue directions for the efficient administration of the Code. Relying squarely on this provision, Circular IBBI/CIRP/86/2025 declares that Form IP-1 shall no longer be required "in relation to all processes under the Code" with effect from the date of the circular itself.

Consequential Compliance Architecture

The immediate practical implication is that Insolvency Professionals must now navigate a two-tier reporting regime. Tier one is the Assignment Module, populated in real time at the point of every fresh appointment, change in role or cessation of mandate. Tier two comprises forms CP-1 to CP-5, each with its own deadline and data granularity, all feeding into the same digital dashboard. The Board has thus collapsed multiple discrete filings into an integrated workflow, eliminating redundancy and reducing the compliance burden without diluting substantive disclosure.

The withdrawal of Form IP-1 is more than housekeeping; it is a signal that the Board regards technological infrastructure as equal to legislative text in achieving the Code's objectives of speed, transparency and maximisation of value. By relegating Form IP-1 to history and entrusting the Assignment Module and the CP-series forms with frontline compliance duties, IBBI has modernised insolvency governance and has also set a precedent for other sectoral regulators.

For further details write to contact@indialaw.in

Related Practice Areas

Insolvency & Bankruptcy