

**Meeting Between Staff of the Federal Reserve Board and
Representatives of XBRL US
September 23, 2024**

Participants: Gillian Burgess, Nuha Elmaghrabi, Sumeet Shroff, Katherine Tom, William Treacy, and Edgar Wang (Federal Reserve Board)

Campbell Pryde, Michelle Savage, and David Tauriello (XBRL US)

Summary: Staff of the Federal Reserve Board met with representatives of XBRL US regarding the agencies' Financial Data Transparency Act Joint Data Standards proposal. XBRL US representatives expressed support for the establishment of the Legal Entity Identifier. As described in their attached presentation, XBRL US representatives expressed their concerns that the proposal's properties-based approach to the joint standard for data transmission and schema and taxonomy formats would not sufficiently promote data interoperability.

Attachment

XBRL US Response to FDITA Proposed Rule

September 23, 2024



Properties-Based Approach

- Proposed:
 - Select any format that has these criteria for a ‘properties-based joint standard’:
 1. Render data fully searchable and machine-readable;
 2. Enable high quality data through schemas, with accompanying metadata documented in machine-readable taxonomy or ontology models, which clearly define the semantic meaning of the data, as defined by the underlying regulatory information collection requirements, as appropriate;
 3. Ensure that a data element or data asset that exists to satisfy an underlying regulatory information collection requirement be consistently identified as such in associated machine-readable metadata; and
 4. Be nonproprietary or available under an open license.
 - Objectives:
 - Give Agencies flexibility
 - Allow for new technologies to be introduced over time
 - Offers options: CSV, XML, JSON, Inline XBRL, PDF/A
 - Assumes “...data transmission or schema and taxonomy formats that have these properties are likely to be interoperable with each other”.

Concerns: Properties-based approach

- Will result in data that is not interoperable – siloed, discrete datasets
- No economies of scale
- Custom tools needed to report, collect, extract and analyze

Assets Represented in Custom Schema for Regulation Crowdfunding Companies

<totalAssetMostRecentFiscalYear>184886.00</totalAssetMostRecentFiscalYear>

This schema incorporates the time period of a reported value with the name of the fact, "assets"

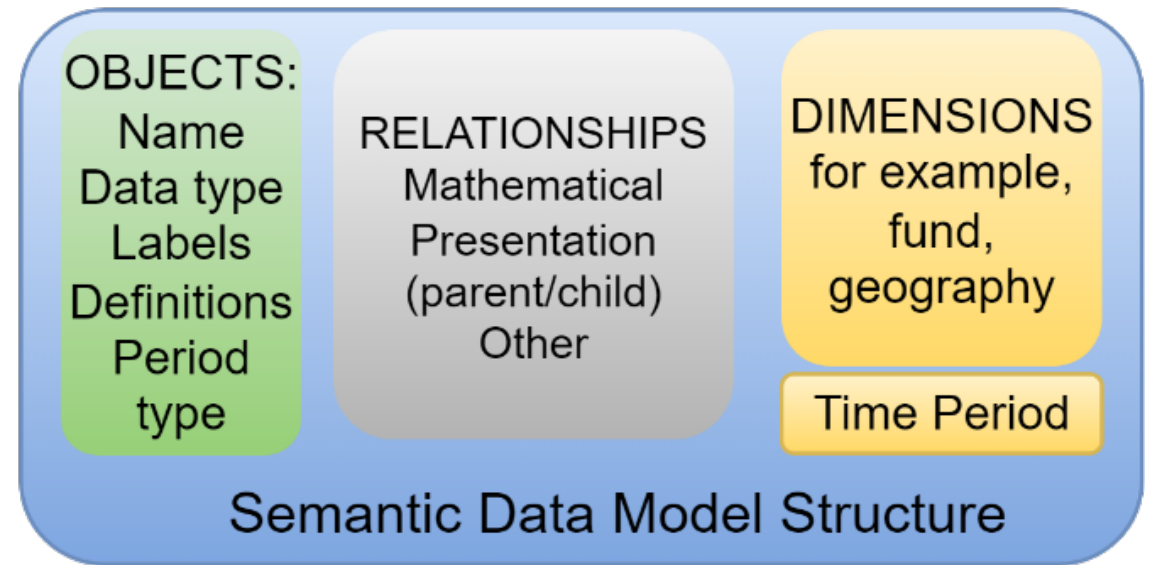
Assets Represented in Custom Schema for Regulation A Companies

<totalAssets>73765284.00</totalAssets>

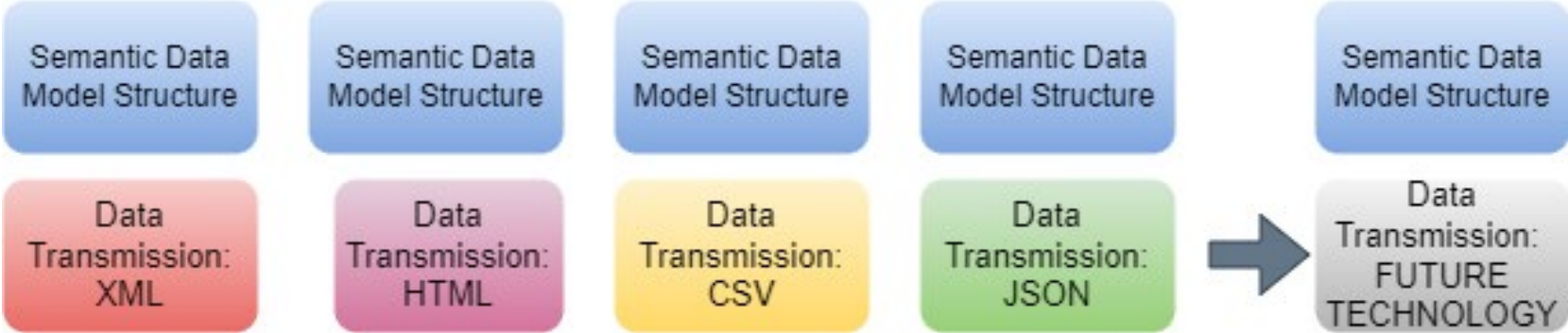
This schema captures the time period of the value in the report document

Recommendation: Semantic Data Model Structure

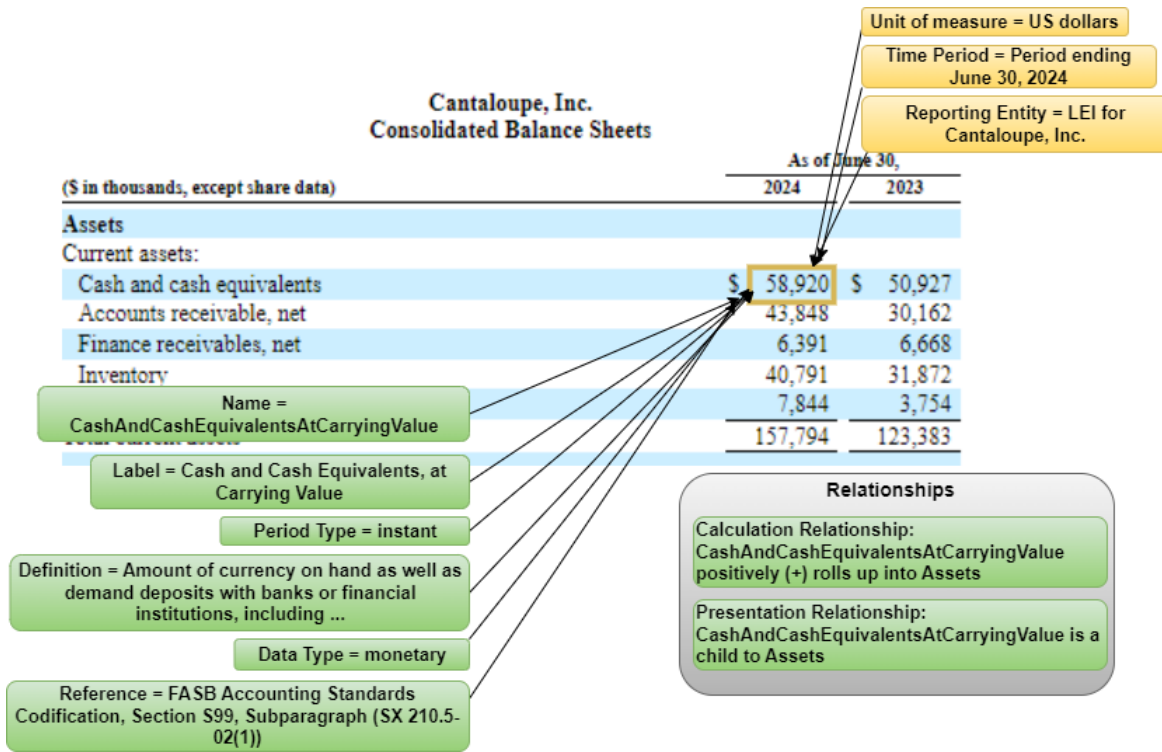
- Digital structure to express features (metadata) and relationships of the data
- Can represent many kinds of data from many kinds of entities, expressed in the same structure
- Data generated
 - Is machine-understandable
 - Can be shared, commingled, inventoried, databased



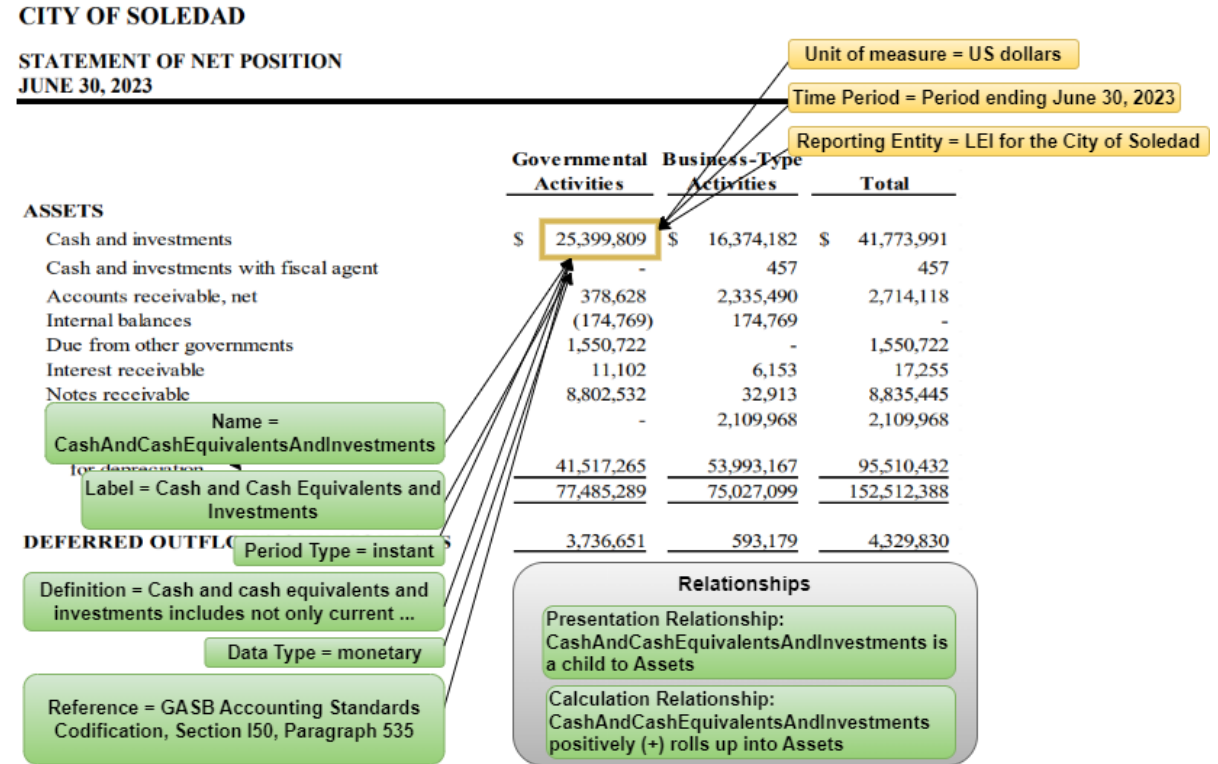
Agency flexibility to select data transmission format and plan for future



Recommendation: Semantic Data Model Structure



Corporate reporting with FASB GAAP



Government reporting with GASB GAAP

SAME STRUCTURE, DIFFERENT DATA, DIFFERENT ACCOUNTING STANDARDS = INTEROPERABLE DATA

Other issues

- Eliminate off-ramps that will dramatically limit the efficacy of the program, “to the extent practicable”
- Require a taxonomy/schema for every data collection that will be shared, inventoried, databased, even two facts in a form like name and address.
 - The proposal states, “*Not all Agency collections of information have a schema and taxonomy associated with them, as a schema and taxonomy may not be appropriate.*”
- Re-use existing taxonomies where possible.
- Require the LEI as proposed.
- Establish a long-term governance structure to ensure Agencies work together going forward.
 - The proposal states that the Agencies “*expect to work together on the adoption of the established joint standards in the Agency-specific rulemakings or other Agency actions*” but nothing in rule suggests plan to do so