

Data Quality Committee
October 15, 2025
Meeting Notes

Attendees

Committee Members

Campbell Pryde, Shelly Wavrin, Charles Kessler, Sonny Jablonski, Pranav Ghai, Brian Bracey, Ami Beers, Amit Varshney, Kathleen Shelton

Absent

Adrian Cloutier, Jennifer Liu, Glad Sully

Staff

David Tauriello, Michelle Savage

Observers

Louis Matherne, Eric Iverson

Welcome

- Shelly welcomed attendees and introduced the agenda

Minutes Approval

- Motion to approve minutes from June 18, 2025, DQC meeting
- Vote (For 9, 0 Against)
- Motion passed. June 18, 2025, DQC meeting minutes approved.

Review and approval of Version 28

- Campbell mentioned that several rules address BDC; however, the rules will impact the SEC inline viewer and more testing of these rules is needed. Therefore, some rules will be delayed until version 29 (Rule DQC_0208, DQC_0209, DQC_0218). FASB requested removal of rules DQC_0203 and DQC_0205.
 - DQC_0212 - Missing Shares Issued or Authorized Facts When Shares Outstanding Reported - Updated rule to handle class of stock axis values reported and if the company has no ticker, then authorized share check is not run.
 - DQC_0213 Missing Calculation Children for Key Balance Sheet Items – Updated to remove Stock holders Equity from list of items with calculation children and excluded zero values from the rule.

- DQC_0214 Missing Equity Concepts in Balance Sheet Calculation – Amended the rule so it would not run where the rule values are zero. This rule checks where equity values are not reported in the balance sheet.
- DQC_0215 Extension Element Name Matches US GAAP Element - Fixed incorrect namespace so that the rule would check lower case item extensions correctly.
- DQC_0216 Improper Use of Extension Geography Members on StatementGeographicalAxis - No Changes to the rule.
- DQC_0217 Improper Use of Notional Amount Concepts with InvestmentIdentifierAxis – Updated to make only applicable to BDCs.
- DQC_0219 Missing Value for NonInvestmentAssetsLessNonInvestmentLiabilities - Updated to make only applicable to BDCs
- DQC_0220 – Improper Use of StatementTable in Notes Disclosures - Removed those items that were coming up as errors where statementTables were used in Level 3 disclosures.
- DQC_0221 - Missing NumberOfReportableSegments When Segment Facts Are Reported - Added NumberOfReportableSegmentsNotDisclosedFlag if the number of segments is not disclosed.
- DQC_0222 Scaling Error in EntityPublicFloat - Added rule to capture scaling issues with public float.
- DQC_0223 (IFRS) Extension Leaf Items on Statement of Operating Activities or Income Statement – Rule added and updated to use the correct taxonomy version. This rule addresses cases where extension concepts are used as leaf items (i.e., items with no calculation children) on the statement of operating activities or income statement but are not clearly identified as relating to operating, investing, financing, income tax, or discontinued operations
- Campbell discussed updates to other rules previously approved that were updated for performance updates. These updates are informational and will not be voted on by the committee.
 - A number of rules were updated by request from the SEC for speed performance. These include: DQC_0043, DQC_0084, DQC_0182, DQC_0150, DQC_0135.
 - Some rules were updated to remove certain elements from the rule, these include:
 - DQC_0015 – remove EmployeeBenefitPlanChangeInNetAssetAvailableForBenefitIncrease
 - DQC_0080 – remove FinancialAssetsHeldForManagingLiquidityRisk and TaxRateEffectOfImpairmentOfGoodwill
 - DQC_0082 remove 0082.9295, 0082.9296
 - DQC_0100 remove 0100.9594
 - DQC_0121 remove elements under Asu201712TransitionAbstract and ASU201807TransitionAbstract

- DQC_0158 – rule removed since RelatedAndNonrelatedPartyStatusAxis is removed from 2025 taxonomy
 - Some rules were expanded to include form types:
 - DQC_0087, DQC_0090, DQC_0124, DQC_0135 – expanded for Forms '10-K/A','10-KT','20-F','20-F/A','40-F','40-F/A'
 - DQC_0137 - expanded for Forms '10-Q/A','10-QT', '10-QT/A'
 - DQC_0146 – expanded for '40-F'
 - For all rules- created a rule form lookup to exclude rules running on inappropriate form types
https://github.com/DataQualityCommittee/dqc_us_rules/blob/master/dqc_us_rules/resources/rule-form-lookup/rule-form-lookup.csv
 - There was a request to publicize this list
 - Some rules were updated for certain circumstances
 - DQC_0166 will not run on Form '2.01SD'
 - DQC_0192 will only run where facts are disclosed on balance sheet
 - Some rules were updated to only run on BDC filings. These include: DQC_0197, DQC_0199, DQC_0207, DQC_0210
 - DQC_0190 was updated for alternative plan names for EBP plans to fix issues with dei facts flagging errors
 - DQC_0195 was updated for false positives with class of stock axis
 - DQC_0198 was updated to fix the alignment of units (matches percentage with monetary amounts)
- Motion to approve rules DQC_0212, DQC_0213, DQC_0214, DQC_0215, DQC_216, DQC_0217, DQC_0219, DQC_0220, DQC_0221, DQC_0222, DQC_0223 effective December 15, 2025, by Brian Bracey, seconded by Amit Varshney
- Vote (For 9, 0 Against)
- Motion passed. DQC_0212, DQC_0213, DQC_0214, DQC_0215, DQC_216, DQC_0217, DQC_0219, DQC_0220, DQC_0221, DQC_0222, DQC_0223 effective December 15, 2025 approved.
- There was a question as to when filings are amended, rules may fire because certain rules were not in effect at the time of the original filing. The expectation is not to update the amended filing for these new rules. May need to consider changes to rules to exempt filings prior to a specific date. Also there is a need for guidance related to amending filings. This may be applicable to rules for segment reporting, may need to think more about this scenario.

Introduction of Version 29

- Shelly mentioned that the next rule set is under development. The final V29 rule forms will be distributed to the committee for approval prior to public comment on November 15, 2025.
- Campbell introduced rules for v29.

- DQC_0224 (IFRS) – Reconciliation of Management defined Performance measure Domain, recreates rule defined in IFRS Formula
- DQC_0225 Concepts used in income statements which are roll forward items of other accounts
- DQC_0226 US GAAP elements used in the 11-K, only for items that are not abstracts
- BDC Typed dimension check into BDC rules, these rules were deferred from version 28 (DQC_0208, DQC_0209, DQC_0218). There were concerns with these rules having trouble with SEC browser. While the SEC has updated the browser there are still concerns over the amount of extra work that will be required to tag these items. A discussion with the SEC staff will be necessary prior to releasing these rules for public comment.

Meeting adjourned 11:00 AM after which, DQC held a closed session.