

Data Quality Committee
March 18, 2026
Meeting Notes

Attendees

Committee Members

Campbell Pryde, Shelly Wavrin, Sonny Jablonski, Pranav Ghai, Brian Bracey, Ami Beers, Amit Varshney, Kathleen Shelton, Jennifer Liu, Glad Sully

Absent

Adrian Cloutier, Charles Kessler

Staff

David Tauriello

Observers

Louis Matherne, Kenny Ng

Welcome

- Shelly welcomed attendees and introduced the agenda

Minutes Approval

- Motion to approve minutes from October 15, 2025, DQC meeting
- Vote (For 10, 0 Against)
- Motion passed. October 15, 2025, DQC meeting minutes approved.

Review and approval of Version 29

- Campbell introduced version 29 rules for approval.
 - No changes to the following rules since publication during public review:
 - DQC_0208 — Subtotals match Extensible Enumerations in the Schedule of Investments
 - DQC_0224 — Management Defined Performance Measure Reconciliation Accuracy
 - DQC_0225 — Prohibited Recognition and Derecognition Items on Income Statement
 - DQC_0231 — Aggregate and 'Other' Concepts Appearing as Siblings in Calculation Networks
 - The following rules relate to BDCs and there are issues that will need to be raised with SEC staff. Campbell recommended holding off on approval of the following rules:

- DQC_0209 — Missing Extensible Enumeration Elements on the Schedule of Investments –The rule checks that extensible enumerations have been tagged. One of the problems with this rule is that the files are very large with numerous facts that cause the SEC’s EDGAR viewer to fail. Another issue is that it is a lot of effort for companies to tag this data. Finally, since these are not numbers being tagged, rather text string, there is a discrepancy between the SEC rule and FASB guidance on the requirements to tag this data. The rule covers 4 common areas covered in FASB guidance related to extensible enumerations on the investment identifier axis. There are many errors for this rule.
- DQC_0218 — Missing InvestmentIssuerAffiliationExtensibleEnumeration on the Schedule of Investments – This rule has a similar issue as rule 209 with the investment issuer affiliation. There are many errors for this rule. Campbell recommends holding off on approval until connecting with SEC on the issue.
- The following rules have had modifications since the public review
 - DQC_0226 – US GAAP Elements Used in Employee Benefit Plan Filings – In order to address false positives, modified rule to replace the taxonomy concept name with a fact-driven approach to detect elements used in the filing rather than solely relying the taxonomy concepts list.
 - DQC_0227- Calculated Ratio Consistency Checks (Scale Check) - Added a perShareItemTolerance of 0.01 for concepts with datatype dtr-types:perShareItemType. The interval comparison checks (greaterThanLowerBound and lessThanUpperBound) now add/subtract this tolerance, so per-share rounding differences are tolerated and do not produce false positives.
 - DQC_0228 - ‘Other’ Concept Should Not Exceed Aggregate - Multiple updates to refine equality logic for calculation comparisons
 - DQC_0229 - Multiple "Other" Concepts in Calculation Network – rule removed due to the fact that it is duplicative of DQC_0230 and identified the same errors
 - DQC_0230 — Disallowed ‘Other’ Concepts in Calculation Networks – expanded rule to broaden missing calculation detections
 - Added AccountsAndOtherReceivablesNetCurrent and InterestExpenseOther to the calculation network logic. Updated message text to clarify that calculated concepts should only have "other" concepts that can comprise them.
 - Replaced the previous OR check for AccountsAndOtherReceivablesNetCurrent and InterestExpenseOther with a set intersection that also includes InvestmentsAndOtherNoncurrentAssets and PrepaidExpenseAndOtherAssetsCurrent, detecting when these concepts are present in \$unallowedOtherUsedInNetwork.
 - Added PropertyPlantAndEquipmentOtherNet to the set of items checked for missing calculations across all years (2022–2026).
 - Added three DisposalGroupIncludingDiscontinuedOperation asset concepts to \$missingCalculationForItem:

- DisposalGroupIncludingDiscontinuedOperationOtherCurrentAssets
 - DisposalGroupIncludingDiscontinuedOperationOtherNoncurrentAssets
 - DisposalGroupIncludingDiscontinuedOperationPrepaidAndOtherAssetsCurrent
- Motion to approve rules DQC_0208, DQC_0224, DQC_0225, DQC_0226, DQC_0227, DQC_0228, DQC_0230, DQC_0231 effective June 1, 2026, by Glad Sully, seconded by Brian Bracey
- Vote (For 10, 0 Against)
- Motion passed. DQC_0208, DQC_0224, DQC_0225, DQC_0226, DQC_0227, DQC_0228, DQC_0230, DQC_0231 effective June 1, 2026 approved.

Introduction of Version 30

- Shelly mentioned that the next rule set is under development with plans to publish for public comment on April 15th, 2026. Rule forms will be sent to DQC for final approval.
- Campbell introduced rules for V30. Three rules for US GAAP and one IFRS rule are included, others are still being developed and if there are issues to be addressed, Campbell requested the DQC to provide information.
 - DQC_0232 (IFRS) Disallowed Combined Total Concepts in IFRS 18 Statement of Operating Activities or Income Statement – IFRS 18 requires activity-based classification of income statement line items. There are three prohibited concepts: aggregate depreciation, amortisation, and impairment charge that cross all activity categories and cannot be meaningfully attributed to a single activity type. Their presence as distinct items in the primary statement is non-compliant with IFRS 18's presentation requirements. The rule will flag when the concepts appear as distinct standalone line items in the statement of operating activities or income statement. We expect that more concepts will be added to this rule in the future.
 - DQC_0233 US GAAP Incorrect Use of ScenarioAdjustmentMember for Accounting Standard Update Adjustments – Rule checks that the precise members CumulativeEffectPeriodOfAdoptionAdjustmentMember and RevisionOfPriorPeriodAccountingStandardsUpdateAdjustmentMember are used rather than the incorrect usage of the more generic ScenarioAdjustmentMember.
 - DQC_0234 US GAAP Incorrect Use of IncomeTaxAuthorityAxis with Domestic Tax Reconciliation Concepts – Tax reconciliations have become more complicated and this rule will address these errors. For 2026 taxonomy usage, rule will flag when income tax reconciliation concepts that are domestic are

disaggregated using the IncomeTaxAuthorityAxis. Rule will also identify when IncomeTaxAuthorityAxis is used elsewhere in the filing, the filer's domestic jurisdiction is always disclosed.

- DQC_0235 US GAAP Incorrect Use of CollateralAxis with Repurchase Agreement and Securities Loaned Concepts – The rule directs filers to use the more precise axis [CollateralPledgedInSecuredBorrowingAxis](#) for disaggregating gross repurchase agreement and securities loaned concepts.
- A rule for following FASB guidance related consistent tagging of the domestic and foreign jurisdictional members on the income tax rate reconciliation schedule is under development and will be submitted to the DQC separately.

Additional Changes to existing rules

- Campbell explained that there were updates to other rules previously approved. These updates are informational and will not be voted on by the committee.
 - DQC_0087 — Lease Liability Reporting – expanded rule for forms, added reporting period filtering
 - DQC_0121 — Incorrect Transition Elements – rule retired for 2026
 - DQC_0124 — Missing Disaggregated Revenue Elements - expanded rule for forms, added historical period filtering
 - DQC_0135 — Dimensional Equivalents (Income Statement) – added reporting period logic, added exclusions and expanded rule for document types
 - DQC_0187 — Property Plant and Equipment Components – updated rule for tolerances
 - DQC_0190 — Employee Benefit Plan Reporting – multiple changes to rule including added rule-focus statements, added a taxonomy navigate approach for LegalEntityAxis, and rule 5 removed
 - DQC_0195 — Retained Earnings and Dividends – added a treasury stock exception
 - DQC_0197 — Income Statement Concepts (Preferred Stock Grouping) - corrected grouping logic for preferred stock items
 - DQC_0198 — Effective Tax Rate – multiple changes to the rule include: period end date filter added, EGC/REIT detection and tax-network checks, zero tax fact filtering prevents rule from firing when the reported tax is zero, adjusted 2025 and 2026 to add EGC logic, add network filtering to limit equivalent-tax-rate checks to only concepts in the presentation, added NCI logic, exclude nil facts when validating paired percentage/amount facts
 - Shelly mentioned that when the rule was originally approved the related disclosures were not in effect and there was limited data to test the rule. Since disclosures are being filed, we are seeing errors that are false positives and we are addressing these issues in the updated rule.

- Campbell mentioned that other changes are still being addressed and further changes will need to be made to the rule.
- DQC_0205 – Balance Sheet Location Axis Validation – remove rule
- DQC_0214 – Equity Items on Balance Sheet – Updated rule to check if items are in the equity presentation or are material, simplified equity check and added AOCI guidance per FASB implementation guide
- DQC_0221 — Segment Reporting Disclosure – expanded reportable flag check, corrected flag name with
NumberOfReportableSegmentsDisclosedByDefinitionFlag
- DQC_0222 — Inconsistent Disclosure of Public Float – updated upper threshold to 2.5B, added an exception to rule for small filer
- Added rule-focus statements to make evaluation context explicit, updates to:
DQC_0004, DQC_0015, DQC_0084, DQC_0108, DQC_0120, DQC_0139,
DQC_0150, DQC_0190, DQC_0198
- Relocated the FILIN-COMPONENTS_OF_NET_INC_LOSS constant into shared constant.xule files for 2023-2026 (this will help SEC EDGAR system)
- New set of rule files added for the 2026 US GAAP taxonomy. 2026 specific axis/member and concept references were added.

Meeting adjourned 10:45 AM after which, DQC held a closed session.