

November 11, 2024



Office of Government-wide Policy  
General Services Administration (GSA)  
1800 F Street NW  
Washington, DC 20006

1345 Avenue of the Americas  
27<sup>th</sup> Floor  
New York, NY 10105  
Phone: (202) 448-1985  
Fax: (866) 516-6923

To: Whom It May Concern:

RE: Docket GSA– 2024–0016

We appreciate the opportunity to provide input to the 6th U.S. Open Government National Action Plan. As President and CEO, I am responding on behalf of XBRL US, a nonprofit standards organization, with a mission to improve the efficiency and quality of reporting in the U.S. by promoting the adoption of business reporting standards. XBRL US is a jurisdiction of XBRL International, the nonprofit consortium responsible for developing and maintaining the technical specification for XBRL, which is a free and open data standard widely used around the world for reporting by public and private companies, as well as government agencies. Our members include accounting firms, public companies, software, data, and service providers, as well as other nonprofits and standards organizations.

We believe that open, nonproprietary data standards are an effective way to advance the Open Government Challenge theme of **fiscal openness**. One problem identified for legislators and regulators at both a federal, state, and local level, is that financial statement, budget, and debt-related data is reported today in paper-based formats such as PDF files. The lack of machine-readable data requires policymakers, oversight agencies, and regulators to manually rekey and validate data before analysis can be conducted. Data standards automate reporting, collection, and analysis, improving consistency, timeliness, and quality of reporting.

Open data standards have been successfully employed in hundreds of regulatory programs worldwide, and in the United States, are extensively used for data collected by the Securities and Exchange Commission (SEC), the Federal Deposit Insurance Corporation (FDIC) and the Federal Energy Regulatory Commission (FERC). These agency programs allow regulators to collect data from public companies, banks, and utilities, respectively, in searchable, machine-readable format because the data is required to be reported using the open data standard eXtensible Business Reporting Language (XBRL) format. Data in XBRL format is interoperable with other data sets, and can be easily shared, inventoried, commingled, and stored. Economies of scale enabled by data standardization reduce regulatory cost and workload, increasing efficiencies across government.

The Financial Data Transparency Act (FDTA) calls for data collected by nine federal agencies, including municipal financial data reported by state and local governments, to be reported in

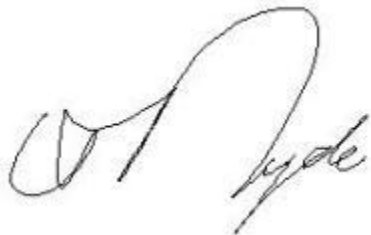
structured, machine-readable format. Governments with municipal debt are likely to be required to report their financial statement data in machine-readable format as early as 2027. Fiscal openness could be furthered by requiring governments to report budget and grants data such as the Schedule of Federal Awards and the Schedule of Findings and Questioned Costs, to the Federal Audit Clearinghouse (FAC) in the same format. Regulators often draw from multiple sources. Data prepared in the same structured format is interoperable and can be extracted and used in the same application, reducing the cost of analysis.

This approach also represents an opportunity to build on existing work. Governments reporting financial statements and budget data in the same format will greatly enhance the usability of all data reported. Making Federal Audit Clearinghouse (FAC) data machine-readable would also satisfy the requirements of the Grants Reporting, Efficiency and Transparency (GREAT) Act which was passed in 2019 but has yet to be fully implemented. Since the General Services Administration (GSA) is now responsible for FAC development, it is well positioned to deliver on the promise of **fiscal openness**.

Collecting data in structured, machine-readable format also supports innovative approaches like artificial intelligence and machine-learning technologies because granular, highly understandable data will provide better outcomes in AI platforms.

Thank you again for the opportunity to provide input to this RFI. I am available to discuss this recommendation further or to answer any questions you may have. I can be reached at (917) 582-6159 or [Campbell.Pryde@XBRL.US](mailto:Campbell.Pryde@XBRL.US). I look forward to discussing this with you further.

Sincerely,

A handwritten signature in black ink, appearing to read 'Campbell Pryde', is positioned above the typed name and title.

Campbell Pryde  
President and CEO, XBRL US