



American Institute of CPAs
1455 Pennsylvania Avenue, NW
Washington, DC 20004-1081

December 18, 2012

The Honorable Mark Warner
United States Senate
Washington, DC 20510

The Honorable Rob Portman
United States Senate
Washington, DC 20510

RE: The Digital Accountability and Transparency Act of 2012

Dear Senators Warner and Portman:

Thank you for your strong leadership in promoting new technologies that will allow users to better understand and compare reported financial information. On behalf of the nearly 386,000 members of the American Institute of Certified Public Accountants (AICPA), I am writing in support of the data transparency provisions of S. 3600, the "Digital Accountability and Transparency Act of 2012," or DATA Act. Further, I encourage you to consider adding language that would strengthen the requirements of these data standards provisions.

The DATA Act calls for the "Secretary of the Treasury, in consultation with the Director of the Office of Management and Budget, the General Services Administration, and the heads of Federal agencies" to "establish Government-wide financial data standards for Federal funds." The legislation further specifies that the Secretary "may...include data reporting standards that, to the extent practicable, incorporate a widely-accepted, nonproprietary, searchable, platform-independent computer-readable format" that are "...in effect on the date of enactment of the Digital Accountability and Transparency Act." Specifically, we believe that the bill should be modified to include these critically important changes that will require adoption of the best possible data standard. As such, we propose the following:

- That paragraph Sec. 3.(a)(6)(e)(2)(A) add the words ", by rule," after the word "shall" and strike the word "may"; and
- That the following two paragraphs be added after Sec. 3.(a)(6)(e)(2)(A)(iii)(III):
 - "(IV) are structured to specifically support the reporting of financial and performance-related data such that any data produced, regardless of reporting need or software used for creation or consumption, is consistent and comparable from one reporting situation to the next"
 - "(V) establish, for each data point, a standard method of conveying the reporting period, reporting entity, unit of measure and other associated attributes;"

Ultimately, the benefits of using data standards, such as eXtensible Business Reporting Language (XBRL), to tag financial data will enhance the accuracy and transparency of financial and performance data. Data standards like XBRL provide the best detailed yet customizable approach to gathering data. Finally, by utilizing consistent data standards, the Secretary will be able to significantly improve both the Federal government's and the American public's ability to analyze information from Federal agencies, providing an unprecedented level of transparency for Federal spending.

We are happy to discuss with you additional areas where implementation of data standards can further enhance reporting and make it more valuable to all types of stakeholders of data. If you have any questions, or if we can be of any further assistance, please contact Diana Huntress Deem at 202.434.9276 or ddeem@aicpa.org.

Sincerely,

Barry C. Melancon, CPA, CGMA
President and CEO